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ESG Report

Nordea 1 – European Stars Equity Fund

Second quarter 2022



Nordea
ASSET MANAGEMENT

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Sustainability footprint

The sustainability footprint of EUR 100,000 invested in

Nordea 1 – European Stars Equity Fund

LU1706106447 (BP-EUR) / LU1706108732 (BI-EUR)

For illustrative purposes only

■ Nordea 1 – European Stars Equity Fund ■ Illustrative Benchmark: NASDAQ European Large Cap Index

CO₂ emissions¹ **11.2 t**

Most of your savings are invested in companies that on average emit less CO₂ compared to their peers.



5.0 tonnes less than illustrative benchmark

1) Measured as CO₂-equivalent greenhouse gas emissions

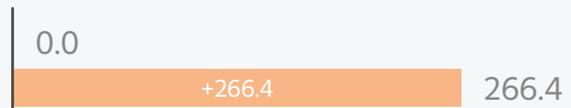
3.3



The equivalent of annual CO₂ emission from 3.3 cars

Underground oil, gas and coal reserves **0.0 t**

None of the companies in your portfolio own fossil fuel reserves, neither oil, coal nor gas.



266.4 tonnes less than illustrative benchmark

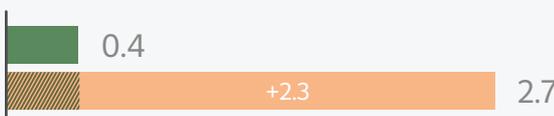


381x
CPH / BKK

Equal to 381 Copenhagen-Bangkok flights

Waste generation **0.4 t**

Most of your savings are invested in companies that on average produce less waste than their peers.



2.3 tonnes less than illustrative benchmark

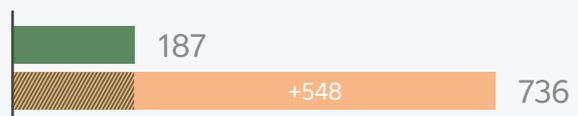
229



Equal to approx. 229 waste bags avoided

Water usage **187 m³**

Most of your savings are invested in companies that on average consume less water than their peers.



548 m³ less than illustrative benchmark



3.8

The equivalent of the water used by 3.8 households

This sustainability footprint overview is prepared by NASDAQ based on analysis of Nordea 1 – European Stars Equity Fund's holdings as of 30.06.2022. The analysis is based on the equity investments in the fund and the holdings are compared to the NASDAQ European Large Cap Index, a broad market index used as benchmark for illustrative purposes only and which does not correspond to the official benchmark of the fund. The calculations are based on an example investment of 100,000 EUR, of which ca. 98% is invested in equities. For illustration purposes only. This overview does not constitute investment advice. Please note that the value of investments can go up as well as down and you might not get back the amount originally invested. Data & metrics are powered by Matter.

Overview of ESG characteristics

Corporate level ESG overlays of Nordea Asset Management

NAM’s Responsible Investment Framework comprises a wide range of RI approaches. Some are decided and deployed at the corporate level – “overlays” – while others are product-specific and apply to solutions with a stronger ESG focus. The corporate “overlays” apply to all funds managed by NAM.

Active ownership

Corporate-level exclusion list

Norms-based screening

ESG integration

Corporate level PAI

All of our funds are subject to minimum sustainability-related eligibility criteria. For example, we do not invest in companies involved in the production of controversial, illegal or nuclear weapons. Nor do we invest in companies with large and sustained exposure to coal mining, with a 10% revenue threshold on thermal coal, and a 30% revenue threshold on total coal (including metallurgical coal). Similarly, we exclude companies with large and sustained exposure to oil and gas extraction through oil sand with 10%, and arctic drilling with 5% revenue threshold.

Fund specific ESG characteristics

Industry exclusions

While engagement is always NAM’s preferred approach, we have made a decision to exclude certain industries from our ESG STARS range.

 Adult entertainment*	 Alcohol*
 Gambling*	 Tobacco*
 Coal mining ^{2*}	 Conventional ³ oil & gas/ unconventional ⁴ oil & gas
 Controversial weapons ⁵	 Military equipment*
 Nuclear weapons ⁶	

* 5% revenue threshold on production

ESG labels⁷



SFDR classification: Article 8

The fund is categorised as an Article 8 product based on Sustainable Finance Disclosure Regulation (SFDR) and adheres to the below characteristics:

- Active Ownership and Engagement
- Enhanced exclusion filters and other limits
- ESG STARS strategy
- Exclusion list
- Norms-based Screening
- Paris Aligned Fossil Fuel Policy (PAFF)
- Principal Adverse Impact (PAI) integration

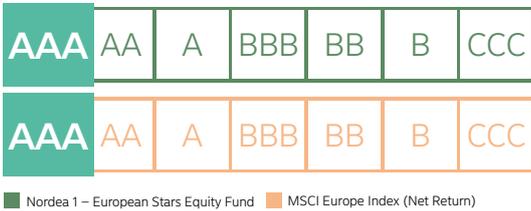
Find out more about RI at Nordea Asset Management:

- » [RI Policy](#)
- » [Paris Aligned Fossil Fuel Policy \(PAFF\)](#)
- » [Nordea’s Exclusion list](#)

2) By coal is meant the extraction of both metallurgical and thermal coal. 3) 5% revenue threshold or alignment with the Paris Agreement as per the PAFF. Refers to oil & gas exploration and production companies, as well as integrated oil & gas companies (BICS classification 135 and 136). 4) 0% revenue threshold on oil sands, shale oil/gas, hydraulic fracturing, and Arctic drilling. 5) 0% revenue threshold. Controversial weapons include anti-personnel mines, cluster munitions, depleted uranium, biological/chemical weapons, incendiary devices. 6) 0% revenue threshold. Production and development of nuclear weapons. 7) LuxFLAG ESG Label recognises the Nordea 1 – European Stars Equity Fund, validity 01.07.2022 – 30.06.2023. Towards Sustainability recognises the Nordea 1 – European Stars Equity Fund, validity Jul. 2022 – Jun. 2023. For more information on sustainability-related aspects of the fund, please visit nordea.lu/legal.

ESG overview

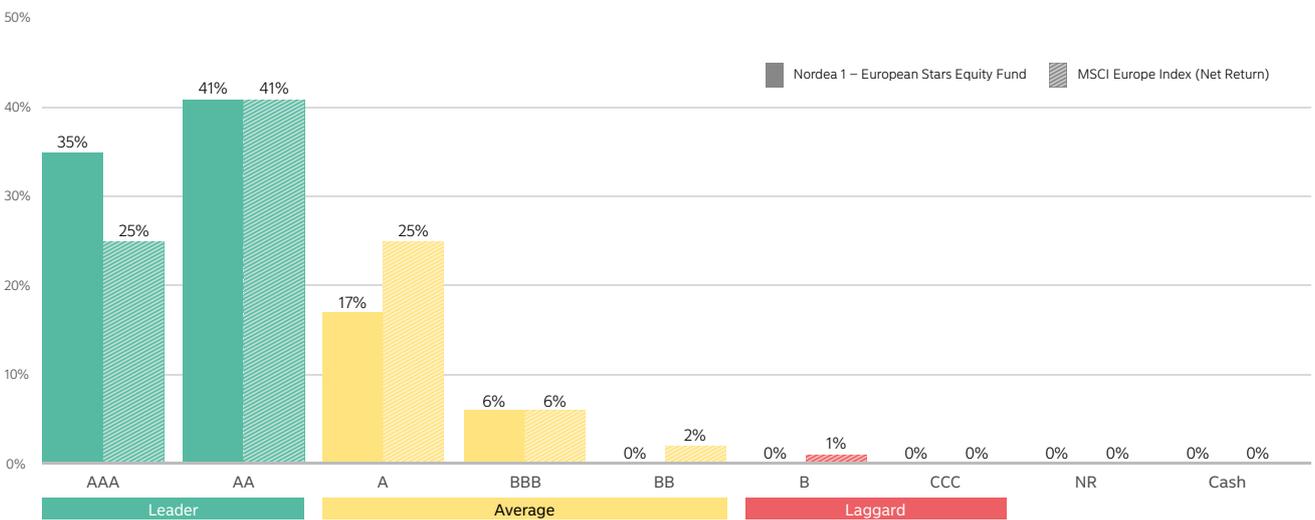
ESG rating⁸



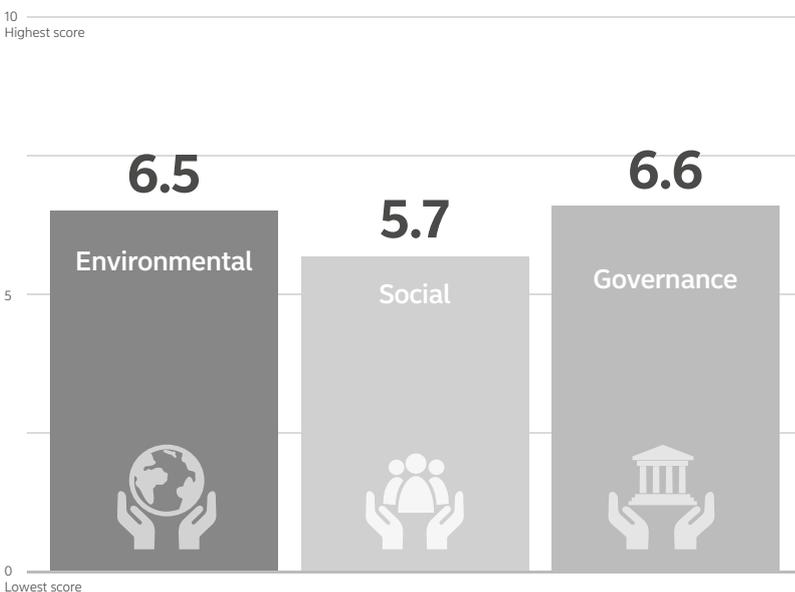
Please note that the MSCI ESG rating is mainly backward looking, relying mainly on publicly available information and can differ from Nordea’s internal ESG scoring which is based on a forward-looking approach.

The ESG Rating assesses the resilience of a fund’s aggregate holdings to long-term ESG risks. Highly rated funds consist of issuers with leading or improving management of key ESG risks.

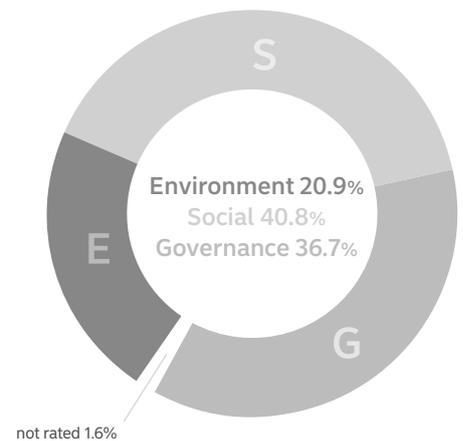
ESG Rating breakdown⁸



ESG scores by pillar⁸



ESG risk exposure⁸



8) ©2022 MSCI ESG Research LLC. Reproduced by permission.

ESG indicators

Environmental indicators

■ Nordea 1 – European Stars Equity Fund ■ Benchmark⁹⁾

101 t



0.0%



2.8%



121 t



6.6%



6.3%



Weighted Average Carbon Intensity (tCO₂e/USD million)

The WACI measures a portfolio's exposure to carbon intensive companies.

Exposure to high impact fossil fuel reserves

The percentage of portfolio's market value exposed to companies that own high impact fossil fuel reserves.

Exposure to environmental controversies

The percentage of portfolio's market value exposed to companies facing one or more very severe environmental controversies.

Social indicators

0.0%



2.8%



6.8%



0.6%



8.2%



8.6%



Exposure to human rights norms violation

The percentage of portfolio's market value exposed to companies in violation of international norms around human rights.

Exposure to human rights controversies

The percentage of portfolio's market value exposed to companies facing one or more very severe human rights and community controversies.

Exposure to labour controversies

The percentage of portfolio's market value exposed to companies facing one or more very severe labour controversies.

Governance indicators

0.0%



93.0%



4.3%



0.2%



91.7%



9.5%



Exposure to companies with no female directors

The percentage of portfolio's market value exposed to companies with no female directors.

Exposure to companies with a majority of independent board members

The percentage of portfolio's market value exposed to companies with board independence above 50%.

Exposure to governance controversies

The percentage of portfolio's market value exposed to companies facing one or more severe or very severe governance controversies.

9) As measured by the iShares Core MSCI Europe ETF. Source: MSCI ESG Research LLC. as of 31.05.2022. ©2022 MSCI ESG Research LLC. Reproduced by permission. Portfolio coverage 99.96%.

Weighted Average Carbon Intensity based on MSCI Europe – Net Return Index as of 30.06.2022. Scope 1&2. For further information on scope 1&2 please refer to the "Methodology – Sustainability footprint" section in the appendices of this report. This metric relies on carbon data gathered by Nordea Investment Funds S.A., MSCI Inc. and is based on the Swedish Fund Association's recommendation. Further information on the calculation approach is available at: nordea.lu/documents/esg-carbon-footprint-disclosure/ESG-CFD_eng_INT.pdf. Source: Nordea Investment Funds S.A., MSCI Inc.

Contribution to SDGs

Total sustainability score (vs benchmark)

The chart below shows the contribution of the portfolio holdings products and services to both environment and social considerations compared to companies held in the benchmark. The contribution of the portfolio to the 15 objectives (social and environmental) is 3.5x higher than the benchmark.



The relative score is calculated as follow: (Portfolio net score)/(Benchmark net score). Should the score of the benchmark be close to zero the relative score multiple might be distorted. Comparison with other financial products or benchmarks is only meant for indicative purposes.

Exposure to the 7 social objectives¹⁰

The contribution of the portfolio to the 7 social objectives is 1.7x higher than the benchmark.



Comparison with other financial products or benchmarks is only meant for indicative purposes.

Top 3 social objectives

1. Ensuring health
2. Providing basic services
3. Delivering education

Top contributors

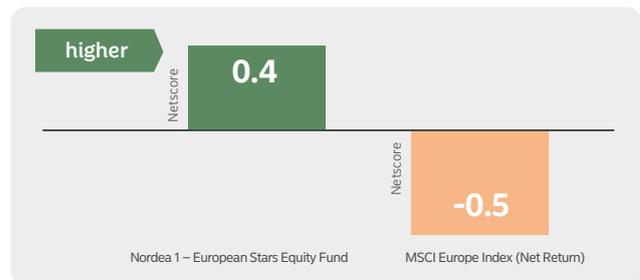
1. **AstraZeneca** (GB, Health Care)
2. **Sanofi** (FR, Health Care)
3. **Novo Nordisk B** (DK, Health Care)

Notes

Benchmark	MSCI Europe Index (Net Return)
Portfolio coverage	100%
Benchmark coverage	99%
Portfolio holdings	42

Exposure to the 8 environmental objectives¹⁰

The contribution of the portfolio to the 8 environmental objectives is higher than the benchmark.



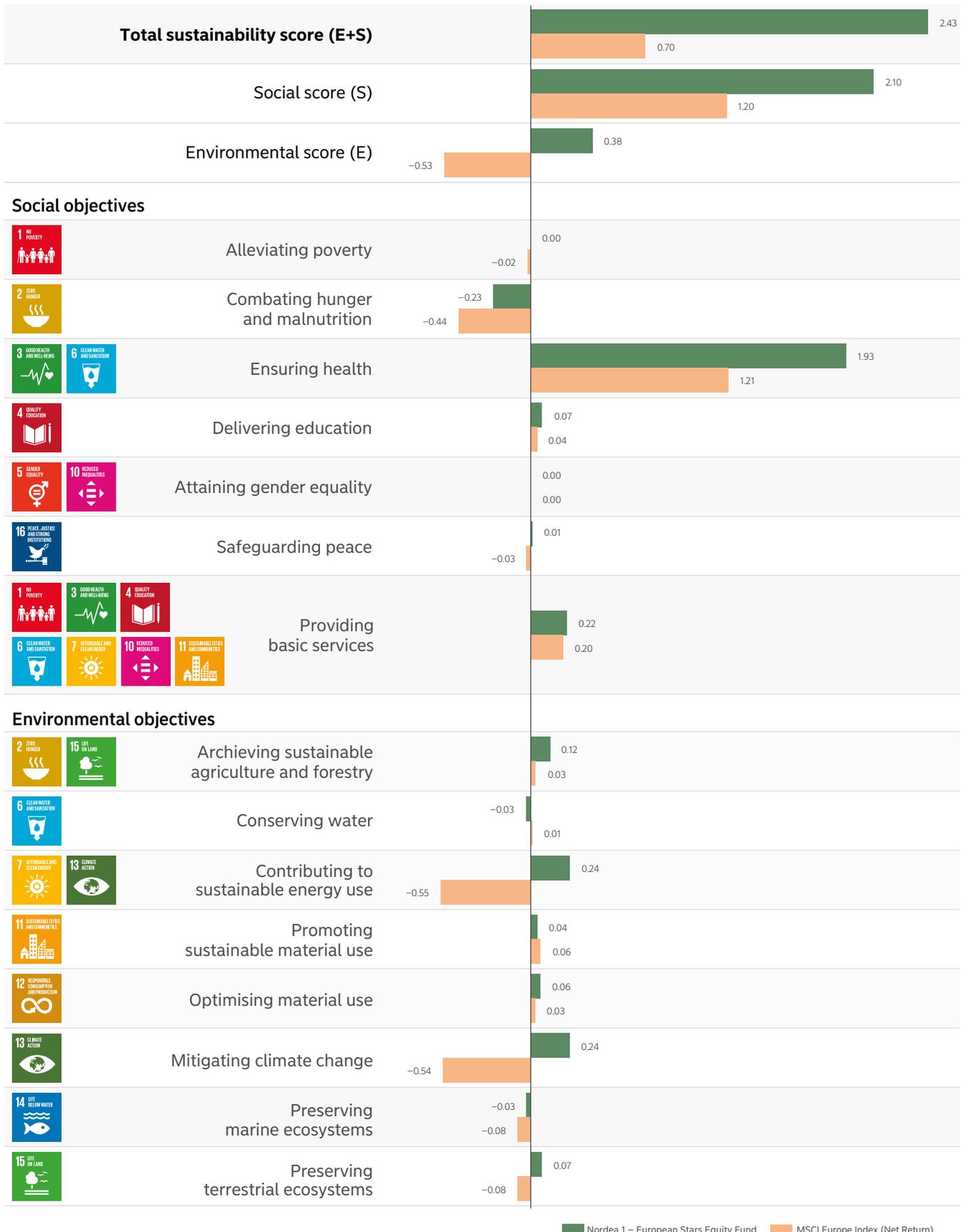
Comparison with other financial products or benchmarks is only meant for indicative purposes.

Top 3 environmental objectives

1. Contributing to sustainable energy use
2. Mitigating climate change
3. Achieving sustainable agriculture and forestry

¹⁰ Please note that the total sustainability score is the sum of the social and environmental scores and may slightly differ due to rounding differences. Further information on SDGs is available at www.un.org/development/desa/en/news/sustainable/sustainable-development-goals.html. Sources: Nordea Investment Funds S.A., ISS-ESG, United Nations Sustainable Development Goals.

Sustainability score details



■ Nordea 1 – European Stars Equity Fund ■ MSCI Europe Index (Net Return)

Comparison with other financial products or benchmarks is only meant for indicative purposes. The total sustainability score (E+S) represents the Overall SDG Solutions Score as defined by ISS-ESG. This score is based on the Social SDG Solutions Score (S) and the Environmental SDG Solutions Score (E). Please note that the Overall SDG Solutions score may slightly differ from the aggregated figures of the social and environmental scores due to rounding differences. Further information on SDGs is available at www.un.org/development/desa/en/news/sustainable/sustainable-development-goals.html. Sources: Nordea Investment Funds S.A., ISS-ESG, United Nations Sustainable Development Goals.

Active ownership

The aim of this section is to describe some of the voting and engagement activities over the last quarter for this specific fund. This tool, therefore, is not meant to be fully comprehensive, but to allow investors to follow-up on the fund’s relevant active ownership activities.

By adhering to Nordea’s responsible investment policy, the fund excludes companies breaching international norms or involved in sectors we do not consider acceptable. However, excluding a company from our portfolios is always a last resort. Engagement is always our preferred approach and of paramount importance to NAM. We believe that active ownership is a powerful way to protect shareholder value, enhance long-term returns and foster positive change. Our active ownership efforts begin with voting on our holdings, attending Annual General Meetings (AGMs) and representation on nomination committees. Our publicly available Voting Portal shows how we have voted in AGMs for stocks held across our funds. Access to the Voting Portal as well as our Corporate Governance Principles can be found [here](#).

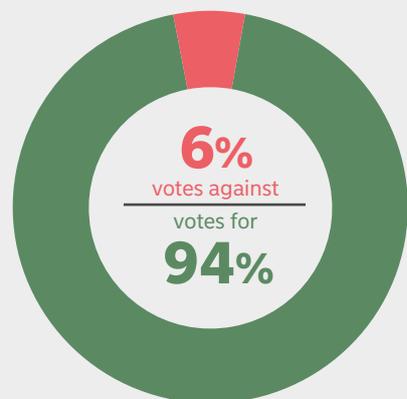
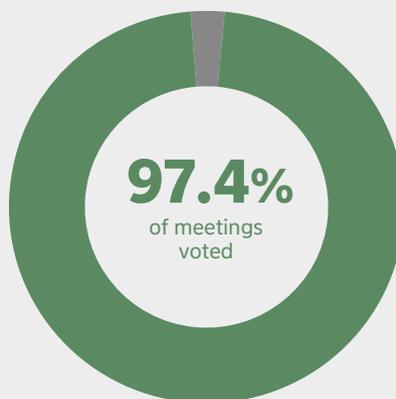
Engagement is the next step of being an active owner and is a crucial component of our RI philosophy and framework. Our engagement activities fall into one

or more of three different categories. The first type addresses companies that are in breach of international norms or conventions or those involved in ESG-related incidents. The second type relates to ESG-related risks or opportunities identified by portfolio managers and financial analysts via our company assessments. The third and final stream concerns our thematic engagements.

Engagement categories:

- **Norms- and incident-based engagement:**
engaging with companies breaching the international norms or conventions or companies having ESG related incidents
- **Investment-led engagement:**
engaging with companies on their material ESG risks
- **Thematic engagement:**
engaging on specific sustainability themes in focus

Voting



Engagement cases

BT Group

Nordea ESG scoring ¹¹	Proxy Voting ¹²	SDG Engagement	Engagement topic
B+	✓	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="background-color: #e67e22; color: white; padding: 2px 5px; display: inline-block;">9</div> Industry, innovation and infrastructure </div> <div style="display: flex; flex-direction: column; gap: 5px;"> <div style="background-color: #e74c3c; color: white; padding: 2px 5px; display: inline-block;">5</div> Gender equality </div>	Social – Customer Relations, Accessibility

Overview

BT Group is a large provider of communication services. The company is active globally with a main presence in the United Kingdom where it owns and operates fixed line and mobile networks. It serves a wide range of customers across its wholesale and retail presence.

Background

The global pandemic underlined the renewed focus on closing the digital divide between urban and rural areas. BT Group is ahead of its competitors with regards to its fiber network expansion which – specifically in rural areas – is crucial for an inclusive economy with accessible and affordable basic communication services.

The purpose of this engagement is to better understand BT Group’s accessibility efforts while it attempts to maintain – and in some aspects expand – their leading position in fiber, 4G and 5G networks.

The Engagement

The company recently changed its tone trying to reposition itself as a part of the solution to social and environmental challenges that societies are facing. The social case for accessibility and inclusion of digital communication services is stronger than ever and the company’s ambitions in this regard are something of a hope spot. However, BT Group’s ambitions in

affordable network expansion needs to be accompanied by ambitious ESG initiatives in order to continuously de-risk its operations. We had a call with the company in May in order to re-assure our investment and ESG case. We are also addressing a controversy relating to alleged overcharges of some of its UK landline customers. According to reports, the case dates back to 2015 to 2018 but received a recent decision of the Competition Appeal Tribunal (CAT) in the UK, which preliminarily assessed that the case may go to court, with BT Group potentially facing compensation claims. The case is based on a report from UK’s communication regulator from 2017, which found that a significant number of BT landline customers have allegedly been overcharged while average prices for landline communication services continued to decline in the given time period. After the report, BT Group cut the landline charges but did not compensate the affected customers.

The case is currently assessed not to pose a material risk for the company but stresses the systemic need for well-functioning internal oversight, processes and policies on the company’s pricing in order to support the narrative of BT Group as an accessible and inclusive solution provider for society.

Outcome

The representatives of BT Group state that the company strongly disagrees with the claim at the Competition Appeal Tribunal in the UK – which

preliminary concluded that the claim has enough prospects to be in court. We have also been informed that the internal focus to provide inclusive and affordable services has been increased recently and are following up with the company on the details.

Recently, we are pleased to see BT Group materially increasing its ESG and sustainability efforts with focus on social aspects which is acknowledged by the ESG rating consensus. This strengthens our conviction in the ESG case – however, we remain vigilant with regards to developments in the above mentioned case and will follow up as needed.

11) Current scoring, based on Nordea proprietary ESG model. 12) Proxy voting refers to the last 12 month-period. Generally, we vote in annual reports and most of the Annual General Meetings (AGM) which occurs once a year. If there is no vote, it is generally because the fund was not invested at the time when the AGM took place. Please find out more on nordea.com/sustainability or access directly the [voting portal](#).

Sampo OYJ

Nordea ESG scoring ¹¹	Proxy Voting ¹²	SDG Engagement	Engagement topic
B+	✓	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="background-color: #800000; color: white; padding: 2px 5px; display: inline-block;">8</div> Decent work and economic growth </div> <div style="display: flex; flex-direction: column; gap: 5px;"> <div style="background-color: #FF8C00; color: white; padding: 2px 5px; display: inline-block;">9</div> Industry, innovation and infrastructure </div>	EU Taxonomy, sustainable product contribution, ESG Integration, climate

Overview

Sampo Oyj operates as an insurance company. The company, through its subsidiaries If, Mandatum, Hastings and Topdanmark, provides commercial and private property and casualty insurance products in the Nordics, UK and the Baltics, as well as life insurance products in Finland. If P&C is one of the largest Nordic property/casualty insurers and the company's largest money maker. About 60% of company's gross premiums come from its private business area while commercial, industrial, and Baltic accounts for the rest. Among its business lines, Motor accounts for the largest with some 40% of gross written premiums.

Background

The EU has put in place an ambitious sustainability agenda for financial markets. The aim is to steer both public and private capital into sustainable investments, ensuring the achievement of the Paris Climate Agreement, while simultaneously protecting the stability of the financial system from environmental risks. This is implemented through a range of new regulations and requirements with the so called EU Taxonomy as a centerpiece, which provides criteria for what can actually qualify as environmentally sustainable.

Understanding climate risk is at the very heart of the insurance industry, and non-life insurers have factored sustainability considerations into their business for a long time. Non-life insurers contribute significantly to the EU's sustainability agenda by providing insurance to vital infrastructure and buildings against natural catastrophes. This is why the non-life insurance activity has been included in the EU Taxonomy with a set

of criteria to recognize it as environmentally sustainable.

Protecting customers and other stakeholders' personal data is of utmost importance for the insurance sector. The Sampo Group companies operate in the sector, which is a highly regulated industry and characterised by a high amount of personal data processing. Sampo can face business risks, operational risks, and reputational risks if it fails to comply with data privacy regulations and guidelines.

The Engagement

We had a call with the Head of Sustainability at Sampo and we followed it up with a physical meeting with the Head of Investor Relations to provide feedback on Sampo's sustainability work, financial disclosure and corporate governance practices. We have then formalized, summarized and prioritized our requests in an email and sent it over to the company.

Outcome

From 2022, a listed company with more than 500 employees must report what percentage of the company's turnover and investments can be classified as sustainable under EU Taxonomy, and special sustainability criteria apply to insurance. Sampo has done the assessment of eligibility of their portfolio for EU Taxonomy showing the majority of activities as eligible. The company mentioned that in 2024, Sampo will report the EU Taxonomy alignment of its insurance and investment portfolios for the first time. The preliminary best estimate, based on reading the criteria and internal discussions, is that there will be very few products that will be assessed as Taxonomy aligned.

We communicated to Sampo that we expect the company to work more actively and collaboratively around the EU Taxonomy criteria interpretation, report alignment as soon as possible and to develop its products in a more sustainable direction with these regulations. We have also given examples of how this could be done.

In our ESG analysis of Sampo we noted certain deficiencies in terms of data privacy and security topic. The company listed information security, and more specifically client data leakage, as the biggest threat from a risk management perspective. Sampo had a Group wide data privacy statement and all subsidiaries had their own statements as well but those were not public. The company was in the process of introducing changes to disclosure around this particular risk. The ambition was to be more granular on unit level but unified reporting was somewhat challenging given the different nature of the business in the subsidiaries. Since then Sampo has significantly improved its disclosure of data privacy and security work where it describes governance, employee training, audit and incident reporting. We further encouraged the company to make public Sampo's Group Information Security Principles with requirements and expectations in terms of data security e.g. Board competence, certification, quality of testing among others.

We have also encouraged the company to engage with invested companies on climate target setting in addition to disclosing progress of their invested companies adopting a target, create Group sustainability targets and link them to Executive Remuneration as well as to enable and leverage on best practice sharing of sustainability work between its subsidiaries.

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Air Liquide

Nordea ESG scoring ¹¹	Proxy Voting ¹²	SDG Engagement	Engagement topic
B+	✓	9 Industry, innovation and infrastructure	Environment - Climate, SBTi

Overview

Air Liquide is a France-based company producing solutions and services based on gases and essential molecules. Some of its solutions improve energy and industrial efficiency by use of application.

Background

The industrial sector is responsible for 23% of global energy-related CO2 emissions (IEA 2021) which stresses the need for increased efficiency in the sector. Air Liquide’s climate track record as well as its emissions reductions need to be considered in a holistic perspective that takes the entire value chain of emissions into account.

The Engagement

Air Liquide tends to score rather badly in conventional carbon foot-printing tools and its status as a heavy emitter has historically tended to penalise it with ESG research and data providers. This has been a long-standing detriment for both the company and its investors. ESG research providers have failed to grasp Air Liquide’s place in the value chain.

Due to the company’s important role in the transitioning of the economy to net zero, we earlier in 2022, decided to increase our engagement with the company by stepping into a co-lead role within the Climate Action 100+ (CA100+) initiative. During the second

quarter of 2022, we have had several calls with the company to better understand their emission target setting and encourage the company to further enhance its commitments and practices. We have specifically discussed the company’s strategic direction of travel, the current state of its Science Based Target (SBTi) approval and how achieving its climate commitments will impact its return profile.

Outcome

Overall, the company has been receptive to our feedback and we believe that its climate performance could be further improved through engagement on aligning its capital allocation and the decarbonisation of its asset base. The company has stressed that the sustainability of its operations and business model is now intrinsically related to profitability, as carbon emissions are turning into a major cost for big emitters. In our conversation, the CEO of the company was confident that there is no need to compromise the return profile to achieve positive, real-world change. The company is currently facing high demand and is able to choose projects where it can create synergies and economies of scale.

With regards to its Science Based Target, we are pleased to note that Air Liquide’s short-term targets (2035) for Scope 1 and 2 emissions was approved in Q2 2022. However, Scope 3 and avoided emissions remain to be

important metrics which currently do not follow standard accounting practices. The company informed us that it is in close conversation with SBTi and its members on finalizing the development of the relevant accounting practices for Scope 3 carbon emissions in the chemical sector. It has indicated that a standardized definition of ‘avoided emissions’ would be required near term to prevent greenwashing and potentially be accounted for as high quality carbon removals in the SBTi framework for corporate net-zero target setting.

Further, we are pleased to note that the company, in its response to the CA100+ lead engagement group’s questions during the 2022 AGM, confirmed its commitment to a Paris Agreement-aligned climate lobbying position and that the company will now carry out and publish a review of its trade associations’ climate positions/alignment with the Paris Agreement.

Finally, we would like to acknowledge that the Head of Sustainability of Air Liquide recognizes that the complexity of its business model results in a need for more explanations on the assumptions underlying its climate risk disclosure and consider further work in that direction in the next Universal Registration Document.

11) Current scoring, based on Nordea proprietary ESG model. 12) Proxy voting refers to the last 12 month-period. Generally, we vote in annual reports and most of the Annual General Meetings (AGM) which occurs once a year. If there is no vote, it is generally because the fund was not invested at the time when the AGM took place. Please find out more on nordea.com/sustainability or access directly the [voting portal](#).

Appendix

Methodology – Sustainability footprint

CO₂e emissions

Shows annual greenhouse gas emissions produced directly by the companies in the underlying funds and from their consumption of energy (Scope 1+2).

This metric is calculated by relating the annual greenhouse gas emissions (in tonnes, translated into CO₂ equivalents) of the underlying companies to the weight of those companies (equity exposure) in the fund/portfolio and to the size of the invested amount. The comparison with the car emissions is based on data from EEA/ICCT on average emissions for new cars sold in EU in 2016.

Why do we measure the CO₂e emissions footprint:

While it is good to turn lights off to save energy, 20 companies have alone contributed to 35% of all energy-related carbon dioxide and methane worldwide, totalling 480bn tonnes of carbon dioxide equivalents (GtCO₂e) since 1965. (Source: The Guardian)

Fossil reserves

Shows the future potential CO₂e emissions if oil, gas and coal reserves owned by the companies in the underlying funds are extracted from the ground and burned.

This metric is calculated by relating the proven and probable resources of oil, gas and coal that the underlying companies have disclosed, to the weight of those companies (equity exposure) in the fund/portfolio and to the size of the invested amount. Please note that the calculation considers the lifetime CO₂e emissions (in tonnes) associated with these reserves. The comparison with number of flights is based on calculations from ICAO.

Why do we measure the fossil reserves footprint:

While the business of extracting oil, gas and coal from the ground emits large amounts of CO₂, an even larger amount is emitted when the resources are used as fuel. Extraction companies can therefore potentially cause future emissions by extracting reserves.

What are CO₂ equivalents:

Different greenhouse gasses that contribute differently to global warming. According to the GHG Protocol, they are all converted into one measure, CO₂ equivalents:

Greenhouse gas	CO ₂ equivalent
Carbon Dioxide	1
Sulphur Hexafluoride	22.8
Methane	25
Nitrus Oxide	298
Hydro Fluoro Carbons	2.400
Per Fluoro Carbons	7.850

What are Scope 1, 2 and 3 CO₂ emissions:

- Scope 1 are direct emissions from owned or controlled sources
- Scope 2 are indirect emissions from the generation of purchased energy
- Scope 3 are all indirect emissions that occur in the value chain of the reporting company, upstream and downstream

For instance, a car manufacturer: The car manufacturer emits CO₂e when assembling cars (Scope 1). The manufacturer's suppliers emit CO₂e to generate electricity for the manufacturer production of electricity (Scope 2). A rental car provider operates the cars and emits CO₂e over the product's lifetime (Scope 3).

Waste generation

Shows how much waste the companies in the underlying funds produce annually, that is either incinerated or disposed to landfill.

This metric is calculated by relating the annual waste generation (in tonnes) of the underlying companies to the weight of those companies (equity exposure) in the fund/portfolio as well as the size of the invested amount. The comparison with number of waste bags considers that an average waste bag has 7kg and is based on data sourced from EU and Plast.dk.

Why do we measure the waste generation footprint:

With the current pace of plastic waste ending up in the oceans (equal to one garbage truck dumped in the oceans every minute), it is projected that by 2050, the total amount of plastic waste in the oceans will weigh more than all fish, and 99% of seabirds will have ingested plastics. Hence there is an urgent need to limit the waste. (Source: WWF)

Water usage

Shows how much water the companies in the underlying funds directly use or purchase annually.

This metric is calculated by relating the annual water use (in cubic meters) of the underlying companies to the weight of those companies (equity exposure) in the fund/portfolio and to the size of the invested amount. The comparison with household usage is based on average European household water consumption data from Eurostat.

Why do we measure the water usage footprint:

The fashion industry is the third largest annual user of water globally after oil and paper, responsible for more than 10% of the water used by all types of industry. Depending on materials and production processes, fashion companies can reduce their water footprint. (Source: Common Objective/WWF)

Disclaimer

Sustainability information

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Methodology – ESG overview

ESG rating

The ESG rating assesses the resilience of a fund's aggregate holdings to long-term ESG risks. Highly rated funds consist of issuers with leading or improving management of key ESG risks. Data provided by MSCI ESG Research LLC.

ESG rating breakdown

The percentage of portfolio's market value exposed to ESG leaders (best in class companies, rated AAA or AA), average ESG performers (rated A to BB), and ESG laggards (worst in class companies, rated B or CCC) relative to the fund's benchmark. Data provided by MSCI ESG Research LLC.

Portfolio ESG scores per pillar

The environment score represents the weighted average of all Key Issues that fall under the Environment pillar. The social score represents the weighted average of all Key Issues that fall under the social pillar. Starting with a "10", the governance score is based on the sum of deductions derived from key metrics included in the corporate governance (including ownership & control, board, pay and accounting) and corporate behavior (including business ethics and tax transparency) themes. The individual pillars of the ESG scores do not add up to the aggregated Fund ESG score due to adjustment factor which takes ESG trends into account during the aggregation process. For further details, please refer to official MSCI ESG Fund Ratings methodology document. Data provided by MSCI ESG Research LLC.

ESG risk exposure

The percentage of portfolio's market value exposed to environmental, social and governance key issues. Data provided by MSCI ESG Research LLC.

Environmental characteristics

Weighted average carbon intensity (WACI):

The WACI measures a portfolio's exposure to carbon intensive companies. Since companies with higher carbon intensity are likely to face more exposure to carbon related market and regulatory risks, this metric can serve as a proxy for a portfolio's exposure to potential climate change-related risks relative to other portfolios or relative to a benchmark.

Calculating a portfolio's WACI is achieved by calculating the carbon intensity (Scope 1 + 2 Emissions / \$M Sales) for each portfolio company and calculating the weighted average by portfolio weight. Unlike the portfolio carbon intensity, carbon emissions are apportioned based on portfolio weights / exposure, rather than the investor's ownership share of emissions or sales. This measure is in line with the EU's non-financial reporting directive and TCFD (Task force for climate-related financial disclosure) recommendations.

Emissions and sales values for equities is sourced from MSCI, and for bonds from ISS-ESG.

Exposure to high impact fossil fuel reserves (%):

The percentage of portfolio's market value exposed to companies that own high impact fossil fuel reserves. High impact fossil fuel reserves include thermal coal, oil sands, and shale oil and shale gas. Data provided by MSCI ESG Research LLC.

Exposure to environmental controversies (%):

The percentage of portfolio's market value exposed to companies facing one or more very severe environmental controversies related to energy & climate change, land use & biodiversity, toxic spills & releases, water stress, or operational waste. Data provided by MSCI ESG Research LLC.

Social characteristics

Exposure to human rights norms violation (%):

The percentage of portfolio's market value exposed to companies in violation of international norms around human rights. Data provided by MSCI ESG Research LLC.

Exposure to human rights controversies (%):

The percentage of portfolio's market value exposed to companies facing one or more very severe human rights and community controversies related to Impact on local communities, civil liberties, or human rights. Data provided by MSCI ESG Research LLC.

Exposure to labour controversies (%):

The percentage of portfolio's market value exposed to companies facing one or more very severe labour controversies related to child labour, collective bargaining, discrimination, health & safety, labour management, or supply chain labour standards. Data provided by MSCI ESG Research LLC.

Governance characteristics

Exposure to companies with no female directors (%):

The percentage of portfolio's market value exposed to companies with no female directors. Data provided by MSCI ESG Research LLC.

Exposure to companies with a majority of independent board members (%):

The percentage of portfolio's market value exposed to companies with board independence between 50%-100%. Data provided by MSCI ESG Research LLC.

Exposure to governance controversies (%):

The percentage of portfolio's market value exposed to companies facing one or more severe or very severe governance controversies related bribery, fraud, controversial investments, and governance structure. Data provided by MSCI ESG Research LLC.

Methodology – Contribution to SDGs

Description

This report highlights how portfolio companies - through their products and services - have positive and negative impact on a total of 15 sustainability objectives covering both Social and Environmental aspects. These objectives have been developed by ISS-ESG and closely aligned with the United Nations Sustainable Development Goals. The objectives include 7 Social and 8 Environmental objectives with scores ranging from -10 to +10. The results are then compared with the benchmark.

Please note that this report does not comment on the Governance aspect as we already report on such considerations in separate reports.

As the UN SDGs primarily target states and the public sector, not all goals are relevant for companies. For this reason, ISS-ESG defined a total of 15 sustainability objectives which are closely aligned with the SDGs. They are used to assess companies' product portfolios in terms of their contribution

towards sustainable development based on their revenue weight. For each individual objective, a qualitative analysis is conducted to determine whether a product or service category contributes to or refrain from attaining the objective. As a result, the positive and negative effects of different product groups may partly cancel each other out within a given objective.

Further information on ISS-ESG and the methodology is available [here](#).

List of the 15 overarching sustainable objectives

7 Social objectives

- Alleviating poverty
- Combating hunger and malnutrition
- Ensuring health
- Delivering education
- Attaining gender equality
- Providing basic services
- Safeguarding peace

8 Environmental objectives

- Achieving sustainable agriculture & forestry
- Conserving water
- Contributing to sustainable energy use
- Promoting sustainable buildings
- Optimising material use
- Mitigating climate change
- Preserving marine ecosystems
- Preserving terrestrial ecosystems

Please note that each portfolio and benchmark are assigned a score ranging from -10 to +10 based on the above 15 sustainable objectives. For the approach to be meaningful and sound we have assumed that the minimum coverage at the fund level should at least be 60%. This means that for a fund score to be meaningful at least 60% of its holdings need to have a score.

Complete list of SDGs:



UN Sustainability Development Goals

UN Sustainability Development Goals

Corresponding ISS-ESG Sustainability Objectives

	No poverty	<ul style="list-style-type: none"> – Alleviating poverty – Providing basic services (access aspect)
	Zero hunger	<ul style="list-style-type: none"> – Combating hunger and malnutrition – Achieving sustainable agriculture and forestry
	Good health and well-being	<ul style="list-style-type: none"> – Ensuring health – Providing basic services (access aspect)
	Quality education	<ul style="list-style-type: none"> – Delivering education – Providing basic services (access aspect)
	Gender equality	<ul style="list-style-type: none"> – Attaining gender equality
	Clean water and sanitation	<ul style="list-style-type: none"> – Conserving water (quality and quantity aspect) – Ensuring health (sanitary aspect) – Providing basic services (access aspect)
	Affordable and clean energy	<ul style="list-style-type: none"> – Contributing to sustainable energy use (clean aspect) – Providing basic services (access aspect)
	Decent work and economic growth	—
	Industry, innovation and infrastructure	—
	Reduced inequalities	<ul style="list-style-type: none"> – Attaining gender equality – Providing basic services
	Sustainable cities and communities	<ul style="list-style-type: none"> – Promoting sustainable buildings – Providing basic services (access aspect regarding housing, transportation)
	Responsible consumption and production	<ul style="list-style-type: none"> – Optimising material use
	Climate action	<ul style="list-style-type: none"> – Mitigating climate change – Contributing to sustainable energy use
	Life below water	<ul style="list-style-type: none"> – Preserving marine ecosystems
	Life on land	<ul style="list-style-type: none"> – Preserving terrestrial ecosystems – Achieving sustainable agriculture and forestry
	Peace, justice and strong institutions	<ul style="list-style-type: none"> – Safeguarding peace
	Partnerships for the goals	—

Glossary

Active ownership

On behalf of its clients, NAM undertakes a range of engagement activities with companies, in order to affect and influence these to improve their environmental, social and governance practices, including promoting a long-term approach to decision-making. Our active ownership tools include voting, attending AGMs, standard setting, engagement with companies, filing resolutions etc. A detailed description of NAM's engagement processes can be found in the [NAM RI Policy](#).

Engagement

A form of active ownership. The practice of shareholders entering into a dialogue with the management of companies to change or influence the way in which the companies are run.

NAM's engagement activities can be divided into three different categories:

1. **Investment-led engagements:** Engagement on ESG-related risks or opportunities identified by portfolio managers and financial analysts via our company assessments.
2. **Norms- and incident-based engagement:** Engagement with companies breaching the international norms or conventions or companies having ESG related incidents.
3. **Thematic engagements:** Focuses on companies' exposure to specific sustainability themes in focus. We have identified 5 focus themes: biodiversity, climate, human rights, good governance, and water. We engage with these companies both individually and through collaborative engagements.

Enhanced exclusion filters and limits

Exclusions aim at limiting the investment exposure to certain sectors or activities that may be considered to be damaging for the environment and/or the society at large. Sector screenings assess a company's involvement in a specific activity measured by the revenue derived from this activity. Sector exclusions are the result of screenings based on the data and methodology of NAM's selected data vendors. Strategies are available with different exclusion filters including ethical filters targeting tobacco, alcohol, gaming, pornography etc. In addition, some products also feature targets or limits on carbon footprint/intensity relative to benchmark, targeted minimum ESG score or other exclusion lists like the so-called "NBIM list" of the Norwegian Government Pension Fund Global or the Carbon Underground 200 list.

Environmental, Social and Governance (ESG)

Environmental (E), Social (S), and Governance (G) refer to the three main areas of analysis in modern

responsible investment. ESG risks and opportunities are identified through careful analysis of a company's operations. Environmental criteria look at how a company performs as a steward of the natural environment. Social criteria examine for instance how a company manages relationships with its employees, suppliers, customers and the communities where it operates. Governance deals with a company's leadership, executive pay, audits, internal controls and shareholder rights.

ESG integration

The explicit inclusion of ESG risks and opportunities into traditional financial analysis and investment decisions based on a systematic process and appropriate research sources. This considers ESG factors alongside financial factors in the mainstream analysis of investments. The integration process focuses on the potential impact of ESG issues on company financials (positive and negative), which in turn may affect the investment decision.

ESG STARS strategies

The ESG STARS product range uses NAM's proprietary ESG scoring system and bespoke analysis carried out by the Responsible Investment team and financial analysts.

The strategies focus on selecting companies, not only with sound fundamentals, but also with high ESG scores. Using the SASB materiality map, company analysis includes enhanced due diligence on environmental, social and governance risks material to the company, and considers how companies manage their identified ESG risks. Furthermore, each company's business model alignment with the SDGs is taken into consideration, as the strategies' exposure aims to skew towards companies whose activities are net supportive or neutral, rather than detracting towards the SDGs. ESG scores are recalibrated regularly and at least annually, or if triggered by relevant negative or positive events. The ESG model sources data from several external data providers as input for the ESG score.

Exclusion list

NAM excludes companies involved in serious breaches of international norms, where engagement is deemed not to be possible or effective. For example, we ban investment in companies active in the production of controversial weapons, including – but not limited to – cluster munitions and anti-personnel mines, as well as nuclear weapons. NAM also does not invest in companies deriving more than 10% of their revenues from thermal coal, and excludes companies involved in the production fossil fuels with thresholds for revenues coming from oil sands (10%) or arctic drilling (5%). The NAM level exclusion list can be found [here](#).

Integration of Principal Adverse Impact (PAI)

The environmental and social impact of the activities of all NAM investee companies is assessed on an ongoing basis through our firm-level PAI integration. Companies identified as outliers on one or more PAI indicators, are analysed further which may result in a recommendation for action. NAM's disclosure statement on the integration of Principal Adverse Impact indicators can be found [here](#).

Norms-based screening

NAM's investment products are subject to norms-based screening, which identifies companies that are allegedly involved in breaches of international laws and norms on environmental protection, human rights, labour standards and anti-corruption. If a company is identified in this screening process, an internal assessment of the company and the incident is initiated. Typical actions can consist of engagement, quarantine or exclusion. For more information please refer to the [NAM RI Policy](#).

Paris Aligned Fossil Fuel Policy (PAFF)

In addition to the firm-wide exclusion list, a substantial and growing part of NAM's strategies is also subject to our Paris-Aligned Fossil Fuel Policy (PAFF), which sets thresholds for companies' exposure to fossil fuel production, distribution and services and excludes companies that are involved beyond these thresholds if they do not have a documented transition strategy that aligns with the Paris agreement. Funds for which the PAFF is not implemented as a hard exclusion criterion, the PAFF acts as guidance for engagement. PAFF criteria also inform the prioritisation of our top-down thematic engagements. The PAFF policy and list of Paris-aligned issuers can be found [here](#).

Sustainable Development Goals (SDGs)

The Sustainable Development Goals (SDGs) are a collection of 17 global goals set by the United Nations General Assembly in 2015. The SDGs are part of Resolution 70/1 of the United Nations General "Transforming our World: the 2030 Agenda for Sustainable Development". The goals are an urgent call for action by all countries – developed and emerging – in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all the while tackling climate change and working to preserve our oceans and forests.

Overview of Investment Strategy*

This Sub-fund aims to achieve long-term capital growth by investing mainly in a diversified portfolio of equity of companies that are domiciled or exercise the predominant part of their economic activity in Europe. The fund is managed by the Fundamental Equities Team, based in Copenhagen, focusing on fundamental bottom-up

research. Alpha is generated through stock selection and by actively incorporating an ESG based analysis as part of the investment process. Actively managed. Benchmark used for performance comparison only. Risk characteristics of the fund's portfolio may bear some resemblance to those of the benchmark.

* There can be no warranty that an investment objective, targeted returns and results of an investment structure is achieved. The value of your investment can go up and down, and you could lose some or all of your invested money.

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