

Exclusion Instruction

Owner	CIO Danica Pension	Date of approval	April 2024
Administrator	Head of Responsible Investment Responsible Investment 33LH	Next review date	April 2025
Associated Policy	Responsible Investment Policy	Instruction version	Version 4.0

1. Objective

This Instruction defines the framework for how we in Danica Pension integrate exclusions in our investment management processes on basis of sustainability-related considerations.

Our approach to responsible investment is based on the principle of Double Materiality meaning that we therefore consider sustainability factors from the perspective of:

1. Financial Materiality: Protect the value of our investments and generate attractive returns.
2. Environmental and Societal materiality: Reduce the negative impacts and maximize the positive impacts that our investments have on society.

The Instruction operationalises our general commitment to consider and prioritise the principal adverse impact that our investment decisions may have on society prioritised through investment products under management in accordance with the Responsible Investment Policy.

The Instruction also works to protect the value of our clients' investments in that exclusions defined by this Instruction limit exposures to issuers negatively impacted by sustainability factors to the extent applied by relevant products.

2. Definitions

The below definitions apply to the terms used throughout the Instruction. Any term not defined herein shall have the meaning ascribed to it in the Responsible Investment Policy.

Double Materiality	the determination of whether a sustainability factor is of relevance when investing from either the perspective of Financial Materiality and/or Environmental and Social Materiality
ESG	environmental, social or governance
Environmental & Social materiality	the inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors

Financial Materiality	the outside-in impacts that sustainability factors may have on a company's/issuer's economic and financial activities throughout their entire value chain (both upstream and downstream), affecting the value (returns) of such activities.
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3. Scope

The Instruction applies to investment management activities of Danica Pension as covered by the Responsible Investment Policy. Exclusions governed by this Instruction are applied to different degrees and in different combinations by investment products managed by Danica Pension. We strive to maintain certain baseline exclusions applicable to all investment products. In addition, we have extended criteria which is applied to Danica Balance Responsible Choice. The extent to which an exclusion applies to a given investment products is outlined in pre-contractual disclosures of that products.

The Instruction covers direct investments in instruments (e.g., equity, bonds) issued by issuers that are excluded per the exclusions outlined in this Instruction. This also includes labelled sustainability bonds issued by excluded issuers. Affiliation to an excluded issuer does in principle not trigger an exclusion of instruments issued by such affiliated entity. Sovereign based exclusions can also capture other related issuers such as state-owned enterprises.

The Instruction does not apply to investments in derivatives such as index derivatives or other broad-based derivatives. Subject to the binding elements of a given investment product, indirect investments in issuers through underlying funds are in scope of this Instruction.

Exclusions covered by this Instruction are supplemented by statutory restrictions/bans on investing in issuers targeted by sanctions as governed through Danica Pension's AML/CTF and Sanctions Policy.

3.1. Target group

This Instruction applies to all employees, functions, and units in Danica Pension that are involved in or oversee investment management activities. The Instruction is also applicable to any employee, function and/or units in Group subsidiaries if adopted and/or incorporated by the subsidiary in accordance with applicable governance rules.

4. Exclusions

For the investment products, we make available, we apply three different categories of exclusions aimed to reduce exposures to investments that respectively:

- are involved in activities and or with a conduct harmful to society;
- are involved in activities with negative climate impact; or
- are involved in non-ethical and/or controversial activities

Exclusions captured by these categories are outlined in the table, with the reservation that certain clients might requests to have specific exclusions not listed below added to these categories. Whether an exclusion within a category applies to a managed investment product is outlined in the pre-contractual disclosures of that given product.

Exclusion	Definition	Activity	Criteria/ threshold ¹	Data source
Activities and conduct harmful to society				
Enhanced sustainability standards ² (Norm-based screening)	<p>Incident and event-based screening:</p> <p>Involvement in sustainability related controversies, practices, or other activities considered unacceptable in relations to norms.</p>	Incident-based and/or weak sustainability governance	Case-specific	
	<p>Good Governance test:</p> <p>Screening covering pre-set indicators on sound management structures, employee relations, remuneration of staff and tax compliance. The indicators are purposefully simplistic, considering the differences in market-specific, and industry specific governance practices across the globe, to allow for comparability and monitoring.</p>	Non-adherence to good governance practices		
	<p>Country exclusions:</p> <p>Screening of countries' exposure to and management of sustainability factors, aimed at identifying countries that express weak sustainability practices, have weak governance, or have weak social safeguards</p>	Incident-based and/or weak sustainability governance		
	<p>Principal Adverse Impacts</p> <p>Strongly negative performance across individual and/or in combination of principal adverse impact</p>	Sustainability performance	Performance-based and linked to products making sustainable investments	ISS-ESG, Responsible Investment

¹ Revenue threshold means maximum revenue percentage from activity

² See methodology paper: "Enhanced Sustainability Standards Screening" publicly available at: <https://danskebank.com/sustainability-related-disclosures>

	indicators ³ . Includes all mandatory PAI indicators and certain voluntary indicators.			
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Activities with negative climate impact				
Tar sands	Tar sands, also known as oil sands, heavy oil, crude bitumen, or more technically bituminous sands, are a type of unconventional petroleum deposit. Tar sands are either loose sands or partially consolidated sandstone containing a naturally occurring mixture of sand, clay, and water, saturated with a dense and extremely viscous form of petroleum technically referred to as bitumen (or colloquially tar due to its superficially similar appearance).	Surface mining (P) In-situ recovery (P)	5% revenue	ISS-ESG
Thermal coal ⁴	Thermal coal designates coal used by power plants and industrial steam boilers to produce electricity or process steam. Coal extraction: Coal extraction refers to the process of mining/extracting coal from the surface of the ground or underground mines. Surface mining is also referred to as 'opencast' mining and underground mining as 'deep' mining. Power generation: Generation of electricity using thermal coal as the energy source.	Surface mining/"opencast mining" (P) Underground mining/"deep mining" (P) Power generation (D)	5% Revenue	ISS-ESG

³ Thresholds defined in the Danske Bank SDG Model methodology paper available on: <https://danskebank.com/sustainability/sustainable-finance/responsible-investments/sustainability-related-disclosures>

⁴ The Responsible Investment Committee may on exemption basis approve that issuers qualifying under the Net Zero Pathway Framework for Investee Companies are investable under this category. The Net Zero Assessment methodology is available at <https://danskebank.com/sustainability/publicationsand-policies/sustainability-related-disclosures..>

Peat-fired power generation	Peat is organic fuel consisting of spongy material formed by the partial decomposition of organic matter, primarily plant material, in wetlands.	Power Generation (P)	>5% Revenues	ISS-ESG
Fossil fuels ⁵	Fossil fuel, any of a class of hydrocarbon-containing materials of biological origin occurring within Earth's crust that can be used as a source of energy. Fossil fuels include coal, petroleum, natural gas, oil shales, bitumens, tar sands, and heavy oils.	Exploration (P)	>5% Revenue	ISS-ESG
		Production (P)		
		Refining (D)		
		Transportation (D)		
		Storage (D)		
		Energy equipment & services* ⁶ (U)		
		Power Generation		
Fossil Fuel Transition Laggards ⁷	"Fossil Fuel Transition Laggards" is an exclusion criterion linked to investee companies in scope of the "Fossil Fuel" definition with >5% revenues associated to the outlined activities. Investee companies are excluded for this category, if they are assessed as either "Not aligned/Not transitioning to Net Zero" or "Committed to Net Zero", in accordance with the proprietary model maintained and developed by Danske Bank ⁸			
Non-ethical and/or controversial activities				
Controversial weapons	<p>Controversial weapons include the following:</p> <ul style="list-style-type: none"> • Anti-personnel mines • Biological weapons • Chemical weapons • Cluster munition • Nuclear weapons outside the Non-Proliferation Treaty • Depleted uranium ammunition and armor • Incendiary weapons 	<p>Production (P)</p> <hr/> <p>Maintenance (D)</p> <hr/> <p>Sale (D)</p>	>0% Revenue	ISS-ESG

⁵ The Responsible Investment Committee may on exemption basis approve that issuers qualifying under the Net Zero Pathway Framework for Investee Companies are investable under this category. The Net Zero Assessment methodology is available at <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>.

⁶Based on GICS industry group classification (101010)

⁷ Not currently implemented.

⁸ The Net Zero Assessment methodology is available at <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

	<ul style="list-style-type: none"> White phosphorus weapons <p>The weapons are considered controversial as their production and use are assessed to be in conflict with the prohibitions set out in international conventions.</p>	Prime Contracting (D) Key Sub-Contracting (U) Supplier of Key Components (U)		
Tobacco	Tobacco products are products made entirely or partly of leaf tobacco as raw material, which are intended to be smoked, sucked, chewed or snuffed. Tobacco products are also electronic cigarettes and other 'Next-Generation-Products'.	Leaf growing (P) Harvesting (P) Curing (P) Leaf processing (P) End-product manufacturers (D) Value-added resellers (D) (VAR)	5% Revenue	ISS-ESG
Alcohol	Alcohol refers to alcoholic beverages with alcohol volume higher than 2,25%. Alcohol is a psychoactive drug that is the active ingredient in drinks such as beer, wine, and distilled spirits.	Vineyard owners & operators (P) Brewing (P) Distilling (P) Fermenting (P) Nightclub-, bar-, & pub-chains (D) Liquor stores (D) Malt, barley, other commodity inputs (U)	5% Revenue	ISS-ESG
Gambling	Gambling refers to the wagering of money on a game or event such as sports, cards or dice	Betting operators (P) Casinos (P) Lotteries (P)	5% Revenue	ISS-ESG

	games, gaming machines and lotteries. Gambling has historically taken place in physical venues but is now also taking place online.	Gambling brokers (P) End-product manufacturer (P) Affiliates/Lead generation/performance marketing (D) Integrated casino systems (U)		
Military equipment	Military equipment refers to equipment that have been developed, designed or modified for military use based on military specifications. It covers both combat equipment as well as other military equipment with non-lethal functionality.	Production of combat equipment (tanks, ammunition, missiles, etc.) (P) Production of other military equipment (radar systems, surveillance vessels, military software, etc.) (P) Maintenance, repair and logistics (U) Military equipment distribution (D)	>5% Revenue	ISS-ESG
Pornography	Adult Entertainment/Pornography refers to explicit images of sexual behaviour that are intended to cause sexual excitement. This includes products labelled 'erotica', 'porn' or 'adult entertainment'.	Production (P) Broadcasting (P) Distribution (D)	> 1% Revenue	ISS-ESG
SPU	SPU refers to the exclusion list ⁷ maintained by Norges Bank Investment Management/Statens Pensjon Utland	Multiple ESG criteria	Case-specific	Norges Bank Investment Management/Statens Pensjon Utland

⁹ Observation and exclusion of companies | Norges Bank Investment Management (nbim.no)

Multi-asset investment products leveraging external funds should to the extent possible not have exposure towards investments excluded.

External fund due-diligence is carried out in order to assess alignment with applicable exclusion criteria and are subject to ad-hoc screening. From time-to-time there might be excluded investments in such products if an exemption for the specific investment in the product made by an external underlying fund has been approved by the Responsible Investment Committee and disclosed.

Also, the Responsible Investment Committee might in other extraordinary circumstances be asked to approve that an excluded investment is not divested from one or more managed investment products, if such sale at the given time may have adverse effect on other fiduciary duties owed to customers invested into the product.

5. Data sources

Data sources used for exclusions are assessed by the Responsible Investment team in Danica Pension on a continuous basis. The assessments include, but are not limited to, assessments on data coverage, data quality, methodology, costs, and other Danica Pension operational considerations.

No universally accepted framework (legal, regulatory, or others) currently exists in relation to sustainability-related data, information, and assessments. As a financial institutional investing globally in different asset classes, Danica Pension strives to the extent possible to leverage primary reported data and information. Where such is not available, best efforts are made to obtain data, including data estimates, information, and assessments through third-party providers or directly from investee companies, and/or by carrying out additional research or making own reasonable assumptions/estimations.

Sustainability-related data, information, and assessments is therefore not comparable to that of financial information. This implies a risk of misrepresentation of data on sustainability-dimensions or impacts associated to an investment. Despite diligent due diligence in the onboarding of data and other resource and cost proportional considerations in place to ensure the accuracy, completeness, and reliability of the data, it not possible to verify nor guarantee, directly or indirectly, the complete correctness of the underlying data. Therefore, a certain margin of error is still to be expected.

How sustainability-related data, information and assessments are utilized is subject to the specific models, methodologies, and processes applied and governed by Danica Pension's Responsible Investment Policy, Instructions as well as Guidelines.

The Responsible Investment team is responsible for selecting the data source most relevant to each exclusion category.

6. Governance

Any changes to exclusion lists impacting Danica Pension Asset Management or Danica Pension are subject to approval by the Danica Chief Investment Officer.

The Responsible Investment Committee further endorses changes made to exclusion criteria on basis of advice from relevant functions with its effectiveness being subject to approval by the Head of LC&I, Danske Bank.

7. Implementation

Exclusion list is updated on a bi-annual basis unless a review is triggered by other events.

A decision to exclude a company/issuer is implemented no later than on the first bank day of the second month following a decision by the Responsible Investment Committee to exclude. Once implemented, divestments of direct investments should be made within five working days. For indirect investments, divestments are to be made within reasonable time, taking into account aspects such as fiduciary duties, committee schedules, operational implications, and substitution options.

If selling is not possible for liquidity reasons, divestments will be put on hold pending the opportunity to sell at a reasonable price, holdings will be sold.

From time-to-time, updates may be done at other times than outlined above. This could be due to special events/situations, sanctions (impacting ability to sell-off) or due to operational considerations. Responsible Investment has the authority to decide on such extraordinary updates.

8. Disclosures

The list of excluded issuers is maintained by the Responsible Investment team and is to be published in the document 'Excluded Investments' available on Danica Pension website.

[Vi ekskluderer selskaber \(danicapension.dk\)](https://www.danicapension.dk)

Equally information on such companies/issuers that are granted exemptions is available in the document "Excluded Investments".

9. Escalation

The administrator of the Exclusion Instruction must report to the Executive Leadership Team the following significant breaches to the Instruction.

- Overdue Instruction exemptions
- Instruction not approved annually

Any potential problematic case concerning the Group must be escalated in accordance with the Escalation Policy.

Instruction owner must escalate to the governing body in case of breaches to their instruction and if the maintenance of their instruction is not able to be completed in accordance with the Responsible Investment Policy.

10. Review

The Responsible Investment team will, in cooperation with the relevant business unit or group function, evaluate and adhere to Instruction. In case of any differences in views or in case of material decisions related to this Instruction, these can be addressed by the Responsible Investment Committee who decides on the issue, and who can choose to report to the Business Integrity Committee.

The Responsible Investment Committee and the ESG Integration Council will annually receive an update on the implementation of this Exclusion Instruction.

1 1. Change Log

Date	Version number	Comments/changes
02 December 2022	Version 1.0	Instruction created
01 June 2023	Version 2.0	Instruction updated for further clarification purposes and enhancement of process, including review cycles.
10 July 2023	Version 3.0	Updates to Fossil Fuel category and change of data provider as well as editorial changes.
April 2024	Version 4.0	Update to the Controversial Weapons category. "Fossil Fuel Transition Laggards" added as a new Exclusion criteria. Editorial changes has also been made