

# Sustainable Finance Policy

April 2021

## 1. Objective

The Sustainable Finance Policy (the Policy) governs Danica Pension's approach to sustainable finance, and confirms our commitment to responsible banking practices. The Policy governs our efforts to meet the strategic ambitions on sustainability laid out in Danica Pension's Societal Impact & Sustainability strategy, and supports our commitment to operate in a sustainable, ethical and transparent manner.

In Danica Pension, we are committed to creating sustainable progress, and we believe that including sustainability in all aspects of our business is fundamental to creating lasting value for all our stakeholders. To this end, we integrate sustainability factors into financial solutions, processes and governance.

As a pension and insurance company, the most significant impact we have in society is through the financial services - infrastructure, expertise and products - that we provide, and the customers, companies and activities we invest in. This is why the indirect impact created by our investing activities are at the core of our efforts to advance sustainability.

## 2. Definitions

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

<b>The executive management team</b>	The executive management team in Danica Pension (Forretningsledelsen)
<b>2<sup>nd</sup> line</b>	Group Risk Management and Group Compliance
<b>BIC</b>	Business Integrity Committee. The Business Integrity Committee is tasked with taking decisions related to societal impact and sustainability and ensures the decisions are integrated into the business strategies of Danske Bank Group.
<b>BoD</b>	The Board of Directors of Danica Pension
<b>ESG</b>	Environment, Social & Governance
<b>Impact</b>	Positive and negative externalities of Danica Pension's activities
<b>Position</b>	Danske Bank's and Danica Pension's position on sustainability related matters
<b>Responsible Banking</b>	Banking practices to align with the Principles for Responsible Banking
<b>Restriction</b>	Restrictive criteria or thresholds relating to certain sectors, products or companies
<b>Sustainable Finance</b>	Financial activities to support economic growth while reducing negative impacts and increasing positive impacts on environmental, social and governance factors.

## 3. Scope

The Policy lays out the principles for sustainable finance throughout Danica Pension.

### 3.1. Target group

The Policy is a Group Policy that applies to all Danica Pension employees, who through their job function have an influence on our sustainable finance efforts.

The Management Body of a subsidiary may approve this Policy with deviations to ensure the policy is fit for purpose for the subsidiary. The policy administrator in the subsidiary should justify the rationale behind the deviation and ensure that the administrator of the Group Policy is consulted and endorses any deviation.

The administrator of this Policy must document and report any deviations from the Policy to the Business Integrity Committee of Danske Bank A/S and the executive business management team in Danica Pension. The Business Integrity Committee shall report all material deviations from Group Policies to the Board of Directors of Danske Bank A/S.

## 4. Policy Content

**Principle 1: We will strive to align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.**

We believe that the creation of business value and societal value can and must go hand in hand. We are committed to creating sustainable progress in the societies we are part of, and we believe that including sustainability in all aspects of our business is fundamental to create lasting value for our stakeholders.

In addition to ensuring compliance to regulatory requirements on sustainability, Danica Pension as part of Danske Bank is a signatory to several voluntary initiatives aimed at advancing the financial sector's integration of environmental and social considerations as well as driving transparency on sustainability performance.

**Principle 2: We will continuously strive to increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.**

Danica Pension is committed to a fact-based approach to understanding and being transparent on both the positive and negative impact of our activities, products and services. Based on this understanding, clear targets are set, which are calibrated regularly to ensure relevance.

Danica Pension recognises the need to channel more capital towards sustainable activities – and less towards activities that are not compatible with a sustainable future. This will both strengthen the societies that Danica Pension operates in, and ensure that Danica Pension's core business is future-proofed as its core markets transition to a more sustainable future. In this regard, Danica Pension takes positions on sectors and themes where it has a relevant impact and where there are elevated ESG risks.

The positions taken are material from both a financial and societal perspective, and centre on sectors and themes where Danica Pension either 1) has exposures and additional guidance on how to handle the related ESG risks is needed, or 2) has chosen not to have exposures, and needs to communicate the rationale for such a decision. We aim to align our positions across the Group, however, if strictly relevant and needed, individual business units can be allowed to take deviating positions. All positions are approved by the Business Integrity Committee.

**Principle 3: We will work responsibly with our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations**

We are committed to actively supporting our customers to achieve their sustainability ambitions and helping them navigate their transition by providing relevant products and advice.

Delivering financial solutions and advice is at the core of our business, and we recognise that our most significant impact as a pension and insurance company is through the business activities we have with our customers. In that regard we recognise our responsibility and ability to enable sustainable progress by delivering leading sustainable investment solutions and advice that support and incentivise our customers in achieving their sustainability priorities.

As part of our ambitions to be a responsible pension and insurance company, we have ongoing dialogue with relevant companies we invest in. We set clear expectations and standards to our investment companies. If these expectations are not met, we will engage with the company on the issues we see. We believe that positive societal impact is better achieved through engagement than restrictions.

#### Principle 4: We strive to proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

We strive to proactively consult and engage with relevant stakeholders such as customers, investors, rating agencies, NGOs, and the general public when relevant. We aim to engage in relevant strategic and commercial partnerships to enable both our partners and Danica Pension to contribute to society's goals.

As a pension and insurance company we have internal sustainability expertise in several areas and we strive to make our expertise available for stakeholders to the benefit of both stakeholders and society. We recognise that our external stakeholders might have different needs and we therefore seek to ensure relevant experts from across the Group are included in dialogues where needed.

#### Principle 5: We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

Managing risks and being compliant are at the core of how we do business. We want to do the right thing and conduct our business in a way that lives up to legal requirements as well as our own strategies, standards and values. Integrating sustainability into everything we do is at the core of our responsible efforts, and we strive to embed sustainability in our governance documents, processes, procedures, product development, advice and training. Our efforts to embed sustainability naturally also extend to employee & leadership training and awareness programmes, as well as our remuneration KPIs, which include sustainability-related targets.

Collectively, these efforts aim to support employees in driving a culture of sustainable and responsible banking across the Group.

#### Principle 6: We will periodically review our implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

We hold ourselves to the same standards as we expect of our customers and business partners, and we are transparent about our approach, our progress and the positive and negative impact of our business activities. We regularly review both our results and the generated impact in order to calibrate and improve our approach.

Danica Pension's Board of Directors approves the strategy for and receives ongoing updates on the strategy execution of our sustainability efforts.

## 5. Escalation

Where employees identify that there are failures to implement the goals and objectives as defined in this Policy, they should report this to their manager as per the Escalation Policy.