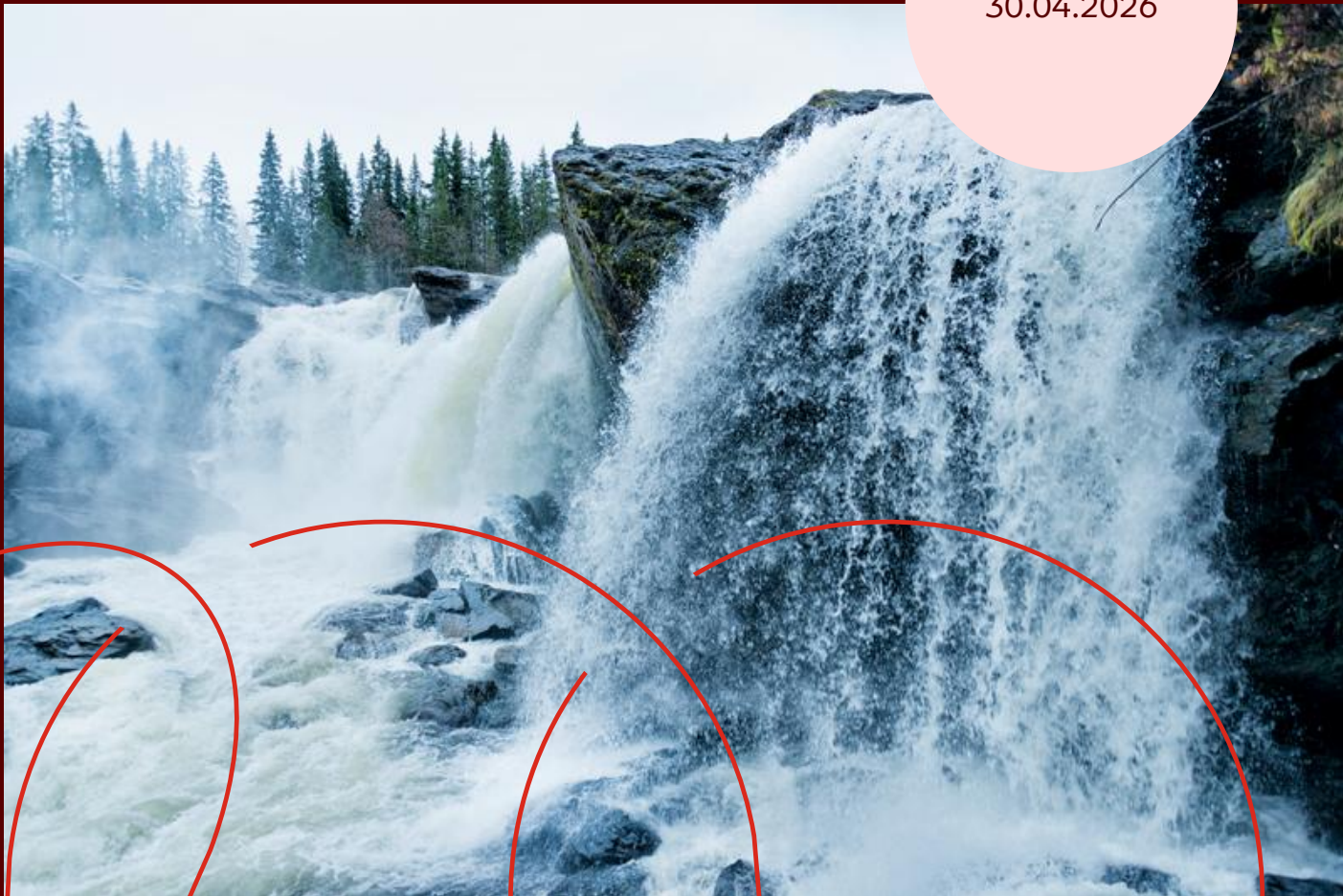


# UK Stewardship Code

Storebrand Asset Management – Policy and Context Disclosure and Activities and Outcomes for the Reporting Year 2025

30.04.2026



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# About this Report

This report covers the stewardship activities of Storebrand Asset Management AS ("Storebrand AM") for the reporting period 1 January 2025 – 31 December 2025. It has been prepared in accordance with the Financial Reporting Council's UK Stewardship Code reporting framework. The report covers all conventional funds managed directly by Storebrand AM. Entities with independent asset-specific stewardship strategies in alternatives, such as Cubera, AIP Management, and Storebrand Real Estate, are excluded from this submission, as explained in Section A.

## Policy and Context Disclosure Report

### A. Describe your organisation, your investment beliefs, your clients or beneficiaries and how that informs your approach to stewardship

#### What your organisation does

##### Organisational Structure and scoping of the report

Storebrand Asset Management (Storebrand AM) is an operating subsidiary of Storebrand ASA (The Storebrand Group). The operations of the Storebrand Group are divided into several areas, each with a clear division of commercial responsibility. Within this structure, Storebrand AM is focused on asset management, for both the group itself as well as external customers.



Figure 1: Legal Structure of Storebrand Group

Storebrand AM owns several asset managers, collectively forming a diversified multi-boutique asset management group with total assets under management of GBP 119 billion as of 31.12.2025.

All Storebrand AM entities are bound by an overall Sustainable Investment Policy, which includes a comprehensive set of sustainability principles and exclusion criteria (norm-based and product-based) that the respective entities with both conventional and alternative investments must adhere

to in their investment processes and respective asset classes. In total, GBP 95 billion<sup>1</sup> (80%) is invested in conventional Storebrand, SKAGEN and Delphi products and discretionary mandates managed by Storebrand AM. These funds, which follow a common stewardship strategy directed by the Storebrand Risk and Ownership team in collaboration with portfolio managers, are the scope of this report. Our three autonomous and separate investment and advisory entities in alternatives (Cubera, AIP, and Storebrand Real Estate including Capital Investment) are outside the scope of this report as they have independent strategies for portfolio management and stewardship.

A significant structural development affecting the scope of this report is the full integration of SKAGEN AS into Storebrand AM. SKAGEN AS, which has been part of the Storebrand Group since 2017, had previously operated under exemptions as a separate management company and subsidiary of Storebrand AM. SKAGEN AS has now been dissolved through a parent-subsidiary merger with Storebrand AM, whereby Storebrand AM became the legal manager of the SKAGEN mutual funds. As a result, the SKAGEN funds are now fully within the scope of Storebrand AM's stewardship activities, stewardship strategy, and the policies described in this report. This represents a meaningful broadening of the stewardship scope compared with prior years.

A further structural development during the reporting period of 2025 was the demerger of Storebrand Real Estate into a separate subsidiary. Storebrand Real Estate now operates as an independent entity within the Storebrand AM Group. Its activities, including any stewardship considerations relating to direct real estate holdings, are conducted under the governance of that subsidiary. The activities conducted directly by Storebrand Real Estate as a separate subsidiary, are outside the scope of this submission.

### Purpose and Vision

Storebrand was an early integrator of sustainability, creating its separate sustainability team in 1995 to ensure the incorporation of long-term environmental and social sustainability principles into our practices at every step of our investment process. While our sustainability focus began with excluding companies and products harmful to society and the environment, it has evolved to become more sophisticated and incorporate the consideration of ESG risks into our analyses and portfolio construction processes over time.

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<sup>1</sup> Converted using exchange rate of 14.2249 as at 31 December 2024 Source: [Exchange rates \(norges-bank.no\)](https://www.norges-bank.no)

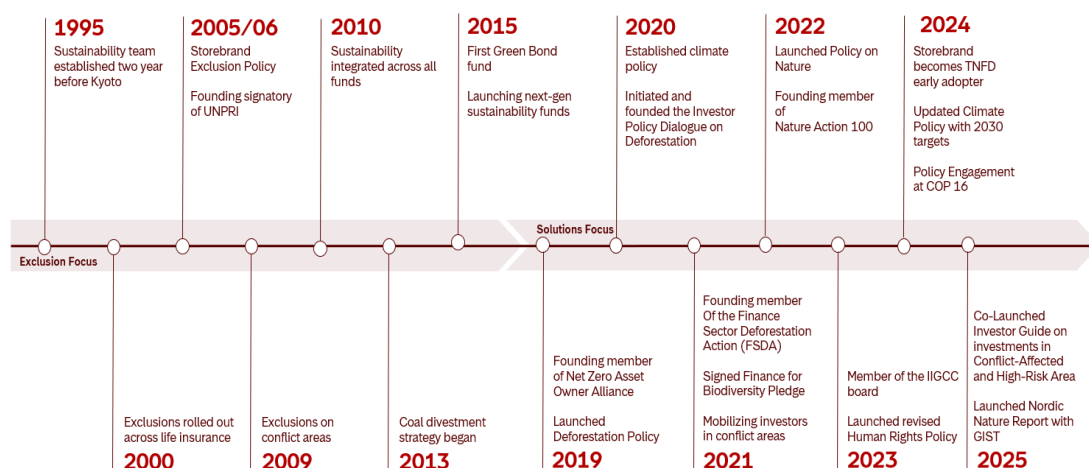


Figure 2: Storebrand AM's Sustainable Investing Journey

In addition to pioneering sustainability with some important exclusion strategies, Storebrand has demonstrated leadership in being a founding member of the UNPRI and Net Zero Asset Owner Alliance, being early to integrate sustainability across all funds under management in the Storebrand Group, launching the first Green Bond Fund and being early to launch specific and dedicated deforestation, climate change & lobbying, and nature policies. We are a member of the UN Global Compact, we follow the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We also support UN Human Rights Conventions and ILO Core Conventions, UN Environment Conventions, and the UN Convention Against Corruption. As you can see from Figure 2 above, our sustainability practice has evolved over time to fuse our solutions focus, investing to address environmental and social problems that we are facing, with an exclusion focus where necessary.

### Business Strategy

Storebrand AM has been a pioneer in sustainable investments for 30 years and has ambitions to set the agenda for sustainable finance in the years to come. Our position as a sustainability pioneer has been central to our international success in recent years. We have sought to grow our international business through offering clients a 'Gateway to the Nordics', leading with our approach to sustainable investing.

In addition to being the gateway to the Nordic region for foreign investors, we aim to be a Nordic asset management powerhouse by being a local Nordic partner and a pioneer in sustainable investments.



Figure 3: Long term strategic positions and enablers

Our experience is that international clients appreciate the holistic approach to sustainable investments offered by Storebrand AM. All products, whether systematically managed or active, integrate the Storebrand exclusion criteria and we apply a top-down approach to engagement on key sustainability themes. Stewardship is undertaken by Storebrand AM on behalf of the full AUM, and not a sub-set of 'ESG' themed funds. Further, we assess sustainability-related risk exposures across all of our AUM and seek to establish engagement initiatives, either at a policy or corporate level, to act as responsible stewards on behalf of our clients.

Storebrand AM has an ambitious set of sustainability goals in the composition of our investment portfolio, from the near-term through to 2050 (Figure 3). These targets, which were updated in 2024, are reflected in our updated Climate Policy<sup>2</sup> and are fundamental to our fiduciary duty in delivering strong long-term returns to our clients. The significance of these commitments to our business means that they must be ambitious but achievable within the nature of our activities. Our previous interim climate targets which were set to 2025 were met, so we increased the ambition and set new interim targets for 2030, while maintaining the ultimate 2050 net zero goal.

Our sustainability experts in the Risk and Ownership team develop proposals for our commitments. They base these on an assessment of our assets under management and scientific pathways for net zero 2050, without overreliance on negative emissions technologies. This proposal is discussed with, and approved by, the CIOs of each business area in asset management. This group-wide commitment is fundamental to our business offering. Strategic and operational implementation of sustainability shall be anchored in, and followed up by, the management and the Boards of the Storebrand Group and its subsidiaries. The Boards of Directors of subsidiaries have overall responsibility for ensuring that the company works with and reports on sustainability in accordance with national laws, legislation, and regulations from the EU, as well as obligations and ambitions Storebrand has undertaken. As part of the annual strategy process, the Boards will consider the company's sustainability strategy.

<sup>2</sup> [Discover Storebrand's climate policy for investments - www.storebrand.com](https://www.storebrand.com)

Our sustainability commitments and targets underpin and inform our investment strategy and require that our product design and engagement approach integrate environmental and societal concerns for long-term economic benefit.

Dimension	Commitment	2025	2027	2030	2040	2050
Solutions	15% of AUM in Solutions	✓				
	20 % of AUM in Solutions			✓		
Emissions	Reduce portfolio emissions intensity by 32%	✓				
	Reduce portfolio emissions intensity by 60%			✓		
	Net Zero emissions					✓
Science-based targets	42% of equity and bond portfolio aligned with SBTi		✓			
	64% reduction in residential property emissions/m <sup>2</sup>			✓		
	71% reduction in commercial property emissions/ m <sup>2</sup>			✓		
Biodiversity	Nature risk assessed and biodiversity target set	✓				
Deforestation	Zero commodity-driven deforestation	✓				
Living wages	Living wages acknowledged in target sectors			✓		
Human rights	Substantial alignment with UN guiding principles			✓		

Figure 4: Key Commitments

A responsible value chain

In our standard sustainability contractual appendix, we set clear, contractual requirements for our suppliers and business partners. The document sets requirements for compliance with the UN Global Compact, Self-declaration against social dumping, Self-declaration on health, safety and environment (HSE) as well as climate and diversity and is attached to all requests for quotation and supplier contacts. In addition to following our internal purchasing guidelines, it is a key principle that goods and services purchased shall promote our main goal of cost-effective and sustainable business operations. Companies in the Storebrand Group may not select suppliers of goods or services from companies on Storebrand Asset Management’s exclusion list.

Our purchasing policy is based on the Group’s governing documents and associated procedures, which are revised annually. Our framework for following up the sustainability work of our suppliers follows the same general principles as for our investments, and in addition the following is factored into our purchasing processes:

We choose - Sustainability is weighted at least 20% in all purchasing processes. Through supplier mapping, we give an advantage to companies that work systematically with sustainability.

We influence - We use our position as a major buyer to influence suppliers and business partners to improve. We do this both when we consider entering into new agreements and evaluating existing contracts.

We opt out - We do not select suppliers, products or services that violate international treaties, national laws or internal policies. This is described in our Supplier Principles.

We conduct an annual survey of the status of the work of suppliers from which we purchase products or services worth more than NOK 1 million. As part of this, we have developed guidelines

for managing our suppliers. We question suppliers about how sustainability is integrated into their strategy, goals and results for climate change and diversity, as well as how they manage human rights-related risk.

### **The type of client you serve**

We serve institutional clients including pension funds and insurance companies, distributors, municipalities; and private customers such as family offices, organizations and foundations; and high-net-worth investors. We use our experience and expertise in managing assets from the Storebrand Group's life insurance companies to provide a specialization-driven, yet full-range asset management concept with a clear sustainable profile, which we offer to institutional clients, distributors, wealth, and retail customers.

Of the total GBP 95 billion in AUM within scope, 95% is managed on behalf of institutional clients, with the remaining 5% attributable to retail clients. From a geographic perspective, retail client exposure is limited to Norway, while 95% of institutional assets under management are held on behalf of Norwegian and Swedish investors.

### **A breakdown of your assets under management (AUM) by asset class and investment style**

As outlined in Section A "Organisation structure and scoping of the report", 80% of total AUM are in scope, covering conventional assets (equities and bonds) across funds and discretionary mandates. The remaining 20% (managed by the out-of-scope boutique entities) comprises alternative investments and other assets, including cash holdings and currency-related derivatives. Of the AUM in scope, approximately 60% is allocated to equities and 40% to fixed income. Equity assets are predominantly invested in passive strategies (around 80%), followed by active global equities (15%), with the remainder in active domestic and emerging market strategies. Passive equity assets are primarily held on behalf of Swedish clients (~60%), followed by Norwegian clients (~30%), with other geographies accounting for less than 5%. Active equity strategies (global, domestic, and EM) are mainly held by Norwegian clients (~80%), with Swedish clients representing approximately 15%, and the remainder distributed across Denmark, the UK, Finland, the Netherlands, and Iceland. Within fixed income, around 60% of assets are in domestic strategies and 40% in global strategies, primarily held for Norwegian and Swedish clients, with a small share attributable to Finnish clients.

### **The proportion of your AUM invested directly or through an external manager**

Storebrand AM's assets under management are managed directly by our own investment teams. Our in-house portfolio managers are responsible for investment decisions across equities, fixed income, multi-asset and alternative strategies, operating within the frameworks set by our Sustainable Investment Policy and related thematic policies. Storebrand AM does not appoint external investment managers to manage its own funds. All portfolio management for Storebrand-branded products is conducted internally. Principle 5 of our Activity and Outcome report explains how external managers interact with the Storebrand AM business and provides details on how stewardship considerations are integrated into decision making.

## **Investment beliefs or stewardship strategy**

Storebrand has created a set of sustainability principles that sum up how sustainability is integrated into our business. The principles encompass all parts of Storebrand's activities, including our products, services and cooperation with suppliers and partners. This is fundamental to the Group's strategy. The following principles form the basis for Storebrand's work within sustainability:

- We base our business activities on the UN Sustainable Development Goals (SDGs).
- Through our products and service-offering, we will help customers make more sustainable choices.
- We are a responsible employer.
- We consider sustainability in all processes and decisions – from the Board and executive management level, who have the overall responsibility, to each individual business manager and employee.
- We cooperate with customers, suppliers, authorities, and partners in our work with sustainability.

We are transparent about our work on sustainability and what we achieve. The Board of Directors of Storebrand ASA sets the overall ambitions and principles for the Group's work within sustainable finance and sustainable investments.

As a fiduciary, our main goal is to ensure the best possible risk-adjusted returns for our clients. At the same time, we acknowledge that, delivering the best possible risk-adjusted returns means protecting the ability of future generations to meet their own needs. We are inspired by the 1987 Brundtland Report from the World Commission on Environment and Development (WCED), which was sponsored by the UN and chaired by former Norwegian Prime Minister Gro Harlem Brundtland. Under Brundtland, the WCED defined sustainable development and developed long term solutions linking environmental and social issues with economic growth. Owing to our Norwegian legacy, sustainability has been a key consideration for Storebrand from day one.

The financial sector plays a key role in helping to achieve the UN Sustainable Development Goals. Responsible asset management, pension savings, other savings and investments may contribute to realizing these goals. The transition to a low-emission society that considers nature, social conditions and international obligations and regulations, represents both financial risks and opportunities for Storebrand as an investor and asset manager. Hence, Storebrand focuses on sustainability, both in products, services and cooperation with suppliers and partners. This is fundamental to the Group's strategy.

Our investment beliefs are based on the assumption that the companies which contribute to solving our societal problems in a sustainable way will also be the most profitable in the long run. We believe companies that understand and utilise sustainability in their business strategies will outperform their counterparts over the longer term. Investing sustainably is thus essential in order to achieve the best possible risk-adjusted returns for unit holders, which is our ultimate goal.

Providing the best possible risk-adjusted long-term returns to our clients obligates an utmost care for the environment and society - not compromising the ability of future generations to meet their own needs. We call this, value beyond return, and it helps our clients build a future to look forward to.

### Approach to stewardship

We take an integrated approach to sustainable investing, combining our sustainability strategy with our investment beliefs. To this end, we adhere to a four-pronged approach:

1. **Solutions-driven investment:** contributing to positive influence by allocating more capital to equity investments in solution companies, green bonds, bond investments in solutions, and investments in certified green real estate and green infrastructure.
2. **Screening and Exclusions:** screening out and/or exiting investments that are not likely to be aligned with our sustainability principles.
3. **Engagement and Voting:** engagement, including voting, on many dimensions and with many stakeholders, to enable or influence the companies we invest in, to reduce their negative impact on climate or society.
4. **Portfolio Integration:** ESG analysis is used as a risk management tool in portfolio construction. We use ESG data to tilt systematic portfolios and manage active strategies with explicit sustainability related objectives.

Taking this approach enables us to be a driving force for sustainable investments, contributing to positive change and development, while reducing financially material risks. It also allows us to set ambitious sustainability related commitments across our business, with clear means of addressing sustainability risks and opportunities towards achieving our goals.

#### 1. Solutions-driven investment

Aligning our investment decisions with the SDGs by allocating more capital to sustainable solutions centred on themes such as renewable energy, smart cities, circular economy and equal opportunities.

We believe that investing in companies providing products and services that help achieve the SDGs will deliver the best risk-adjusted long-term returns for our clients. We therefore invest in sustainable solutions centred on themes such as renewable energy, smart cities, circular economy and equal opportunities.

By the year 2030, we aim to invest 20% of our assets under management in: equity and bond investments in solutions; real estate solutions; solutions for infrastructure; and solutions for private equity. Our solutions investment target for 2025 was 15%, which we had already achieved by 2024. We regularly assess the basis for and scale of the 2030 target.

In our quest to invest in sustainable solutions, we seek to filter for companies that follow Good Governance (GG) and Do No Significant Harm (DNSH) practices, while aligning with the definitions below:

### Equity and bond investments in solutions

Through proprietary analyses, we identify solution companies - companies that help achieve the SDGs through products, services and operations, without causing significant harm to society or the environment.

For equity and bond investments our definition for solutions:

- Issuers with a minimum of 25% green revenues
- Issuers with at least 25% CapEx, operating expenses or revenue aligned with EU taxonomy
- Issuers with at least 25% revenues addressing SDGs
- Green bonds, social bonds, sustainability bonds, sustainability-linked bonds

The companies that issue the green bonds we invest in must comply with international standards such as the Green Bond Principles, the EU Green Bond standard (EUGBS) and the International Capital Market Association (ICMA) framework. The companies are included in a database that is updated regularly. The database is a valuable tool for fund managers and serves as the basis for our thematic solution portfolios (for example, on renewable energy, smart cities and equal opportunities), or as part of broader investment portfolios.

## 2. Screening and Exclusions

Screening and exclusion are key steps in Storebrand Asset Management's implementation of due diligence to identify, manage and mitigate actual and potential adverse impacts in our portfolios. When these adverse impacts cannot be mitigated, and available avenues for escalation are exhausted, the result may be the sale or exclusion of a company from investment.

Our approach is guided by the principles and standards set out in our Sustainable Investment Policy and our Exclusion Policy. The Exclusion Policy applies to all asset classes and does not distinguish between active and passive investments.

Storebrand AM works systematically to invest in companies that contribute positively to sustainability. Our approach to sustainable investments assumes that the companies which contribute to solving societal problems in a sustainable way will also be the most profitable in the long term. This positive selection approach is complemented by the de-selection approach of our Exclusion Policy, with both helping to ensure our clients' future returns.

We apply two main methods:

- Continuously monitoring our investments for controversies in breach of our Exclusion Policy – which covers international norms and conventions within human rights, the environment, governance and anti-corruption – and excluding companies that are in breach, or placing companies on our observation list where there is opportunity to influence a company’s practice.
- Assessing specific Principal Adverse Impacts within our investments as required by the EU Sustainable Finance Disclosure Regulation (SFDR), including but not restricted to the thematic areas highlighted in our Sustainable Investment Policy.

### Screening and monitoring

We systematically monitor thousands of companies for potential breaches of our Exclusion Policy through our external data providers. For the screening of potential conduct-based breaches, third-party data providers deliver “company alerts” every quarter, including background information on the controversies related to potential conduct-based breaches. The controversies are analysed by our experts within the Risk and Ownership team and contact with the company is established where necessary.

Based on the severity and facts in the case, as well as the company’s willingness to address the issue, a decision will be made to engage with the company, place the company on an observation list, or to recommend an exclusion.

Screening of companies excluded by Norges Bank Investment Management (NBIM) is also conducted on a continuous basis. All companies that are excluded by NBIM are assessed against the norm-based criteria of this policy and a decision for exclusion across all investments and products is made by the Sustainable Investment Committee based on a recommendation from the Risk and Ownership team. These cases are taken on an ad hoc basis, at the time exclusions are made public by NBIM, as our Norwegian-domiciled funds adhere to NBIM exclusions.

The same screening process is also conducted on a quarterly basis for potential inclusion of companies that have previously been excluded. If an excluded company demonstrates positive change that reduces the risk of recurrence, the company may be re-included.

### Observation

In some cases, where there is a risk of a violation of our norm-based criteria, it may be beneficial to follow a company over time to increase the information available. Similarly, there may also be cases where we see a company is working on corrective action, but such measures have yet to be fully implemented or verifiable.

In such cases, we place the company on an observation list, associated with specific restrictions, to allow for more time to gather the necessary information and influence company direction. Companies that are under observation will be closely monitored and engaged with based on our existing ownership, and we will maintain a close dialogue with the company where we inform them

of our expectations of measures and results. We expect the company to show improvement within a pre-determined time. Depending on the outcome, the company will either be excluded from our investment universe, or it will be removed from the observation list.

While companies are present on our observation list, any of our portfolios without prior holdings are restricted from investing in these companies. Portfolios with prior positions are allowed to maintain these positions but not to increase shares in the company.

#### Exclusion approach and process

We regard exclusion as a last resort, to be applied in cases where companies fail to demonstrate the will to improve, and there is a risk of recurrence. Exclusion of conduct-based norm breaches is an action we would take where companies clearly fail to demonstrate willingness to cease the breach or incorporate improvements that can mitigate and/or prevent adverse impact.

In cases where there is a risk that companies are systematically in breach of our Exclusion Policy, Storebrand will use its position as an investor to engage companies in dialogue and seek to achieve improvements. If the company is not willing to enter into dialogue, or the dialogue does not lead to positive change within a reasonable amount of time, a company may be excluded from investment.

If we choose to exclude a company, we use formal routines for reporting to companies and internal formalities of compliance working with fund managers. Quarterly reports regarding exclusions are first reported to portfolio managers and compliance, so they are aware of new exclusions. Fund managers have approximately 20 days to sell their holdings in excluded companies. Once this is achieved, other key internal and external stakeholders and clients are directly informed.

Companies excluded are informed of our action and the reasons for our decision. Companies are also informed of the requirements for re-inclusion and are invited to contact us when they believe they have met our requirements.

Excluded companies are monitored continuously and evaluated on a quarterly basis for potential re-inclusion. When our data provider indicates improvements have been made, we assess whether those improvements are relevant to reconsider our grounds for exclusion and decide whether to reopen the case and engage with the company. Prior to re-inclusion, the Risk and Ownership team assess whether the expectations set out in the original exclusion have been achieved and will then make a recommendation to the Sustainable Investment Committee.

## Exclusion methods

We determine potential exclusions from investment on the basis of:

1. Conduct: we may exclude companies based on conduct that breaches laws, conventions or norms.
2. Product: we exclude companies that produce or distribute controversial weapons or generate significant revenues from tobacco, recreational cannabis, coal and oil sands.
3. Business practices: we exclude companies with business practices deemed systematically harmful or unsustainable, as well as state-owned entities or assets.

### Conduct-based exclusions

It is of fundamental importance that the companies we invest in follow applicable laws, as well as international laws, norms and conventions. On the basis of their conduct, we exclude from all our funds companies:

- Contributing to serious and systematic breaches of international law and human rights: Storebrand AM will not invest in companies that cause or contribute to severe human rights abuses or breaches of International Humanitarian Law. The criterion is based on the UN Declaration on Human Rights (UDHR), made operational through core UN and ILO conventions, among others, as well as international humanitarian law instruments such as the Hague and Geneva conventions.
- Involved in systematic corruption and financial crime: Storebrand will not invest in companies that are involved in grand corruption or other forms of serious financial crimes, such as tax evasion, accounting fraud and embezzlement. The criterion is based on the United Nations Convention against Corruption, among others.
- Involved in serious environmental damage: Storebrand will not invest in companies involved in activities that cause serious environmental damage. The criterion includes the UN Convention on Biological Diversity and the UN Framework Convention on Climate Change.

Companies will be excluded if the breaches are considered serious and the risk of a breach occurring is assessed as high.

### Product-based exclusions

Storebrand has also chosen to exclude investments in companies within certain single product categories or industries that are unsustainable as they are associated with significant risks and liabilities from societal, environmental or health-related harms. In these product categories, there is also limited scope to influence companies to operate in a more sustainable way. We therefore exclude from all our funds, companies with:

- Any revenues from controversial weapons: Storebrand will not invest in companies involved in producing or servicing controversial weapons, including but not limited to, nuclear weapons, chemical weapons, biological weapons and land mines. A company can also be excluded when

subsidiaries controlled by the company, typically through ownership of 50% or more, are in breach of the criterion.

- Any revenues from production or cultivation of tobacco: Storebrand AM will not invest in companies with any revenues from the production or cultivation of tobacco, or with revenue exceeding 5% from the distribution, sale, packaging, or advertising of tobacco.
- More than 5% of revenues from recreational cannabis: Storebrand will not invest in companies where the sale of cannabis products for recreational use, or components exclusively designed for such products, exceeds 5% of total sales. The criterion applies to producers and distributors as well as companies involved in the cultivating or processing of cannabis for recreational use but does not apply to income from cannabis products that are not classified as recreational.
- More than 5% of revenues from coal-related activities: Storebrand will not invest in companies with more than 5% of revenues from coal-related activities.
- More than 5% of revenues from oil sands: Storebrand will not invest in companies with more than 5% of revenues from oil sands.

In addition, certain of our funds are subject to extended exclusion criteria. From these funds, we exclude companies with:

- More than 5% of revenues from fossil fuels: Storebrand will not invest in companies with more than 5% of revenues from the production and/or distribution and/or power generation of fossil fuels. Exceptions can be made for so-called "transition companies" involved in the generation, transmission and distribution of electricity (the electric utilities sector) with exposure to fossil fuels, provided that they have a clear transition plan towards renewable energy. For coal-related revenues from exploration, mining, extraction, distribution or refining, the threshold is 1%.
- More than 25% of revenues from Oil & Gas services: Storebrand will not invest in companies with more than 25% of revenues from Oil & Gas services.
- More than 5% of revenues from defence and weapons: Storebrand will not invest in companies with more than 5% of revenues from defence contracts and conventional weapons.
- Any revenues from pornography: Storebrand will not invest in companies with any revenues from the production of pornographic material or from marketing and sales of pornography.
- More than 5% of revenues from alcohol: Storebrand will not invest in companies with more than 5% of revenues from alcohol.
- More than 5% of revenues from gambling: Storebrand will not invest in companies with more than 5% of revenues from gambling.
- Large fossil fuel reserves: Storebrand will not invest in companies that have fossil fuel reserves greater than 100mt of CO2 equivalents.

#### Business practice-based exclusions

We exclude from all our funds companies based on certain unsustainable business practices, as well as those that deliberately and systematically work against the goals and targets enshrined in the Paris Agreement.

- Lobbying: We will not invest in companies involved in lobbying that deliberately and systematically work against international norms and conventions, such as the goals and targets enshrined in the Paris Agreement or the Global Biodiversity Framework.
- Deforestation and nature: We will not invest in companies that are involved in deforestation or conversion of native ecosystems through severe and/or systematic unsustainable production of palm oil, soy, beef and leather, timber, cocoa, coffee, rubber and minerals. We will not invest in companies involved in deep sea mining, marine or riverine tailings disposal, or certain companies operating in biodiversity-sensitive areas.
- Government bonds and state-owned enterprises: We will not invest in sovereign bonds issued by countries lacking elementary governance and institutions to protect human rights and prevent corruption, or that are subject to sanctions by the UN Security Council or the EU, or that are involved in serious breaches of international law. We also exclude state-owned or controlled companies from such countries.

### Roles and responsibilities

Storebrand's Sustainable Investment Committee is responsible for the decision to exclude companies based on a conduct-based norm breach and thus mitigate and prevent the adverse impact. The committee comprises several representatives of the Storebrand Group's senior management team and other executives, who meet on a quarterly basis. Companies will be excluded if the adverse impact and the breaches of our standards are considered severe, and the risk of recurrence is assessed as high, after engaging with the company on measures to prevent recurrence and mitigate the adverse impact.

Storebrand Asset Management's Risk and Ownership team is responsible for exclusion of non-conduct-based norm breaches, such as controversial weapons, and for product-based and activity-based exclusion.

The Risk and Ownership team is responsible for selecting data providers that deliver relevant data enabling the organisation to perform these screens. Data providers may vary over time and are described in the standards pertaining to each product or practice, as outlined in our Exclusion Guidelines.

Storebrand AM's Investment Control and Analytics (ICA) department is responsible for verifying that management complies with individual mandates as well as internal and external laws and regulations. As part of the daily compliance controls, all trades and positions are controlled for breaches based on this exclusion policy.

### Reporting

Storebrand AM's Risk and Ownership team reports to the Board of Directors of Storebrand AM on progress and activities related to the obligations under the Exclusion Policy, twice a year. Externally, we report quarterly and annually on main actions related to exclusions.

We publish separate updates on our exclusion-related activities, as well as in compiled format in our quarterly publication, the Storebrand AM Sustainable Investment Review, all editions of which are available on our website. These updates are also distributed directly to customers and other stakeholders. A list with all exclusions is published and updated quarterly on our website.

Further detail on how we approach exclusions can be found in our Exclusion Policy, which is published in the reporting and transparency section of the Storebrand Asset Management website: [Reporting & Transparency](#)

### 3. Engagement and Voting

We use our position as owners to influence companies to improve corporate behaviour and reduce adverse sustainability impact. Through active ownership, we reduce risks, improve the quality of our investments, and influence companies to move in a more sustainable direction.

We exercise our shareholder rights in two main ways: either through voting at shareholder meetings or by engaging with companies at different levels, including management and board levels. Engagement can be bilateral and/or in collaboration with other investors. Both approaches can be effective in addressing concerns regarding ESG issues to reduce adverse sustainability impact. Engagement and voting, when combined, can reinforce one another and serve as an effective signal to companies regarding our views on important ESG issues and a good strategy to achieve change in corporate behaviour and thus reduce adverse impact.

Our engagement strategy emphasises a positive impact on material sustainability issues (proactive engagement) in addition to redressing wrongs (reactive engagement). We prioritise engagements where we believe we can have a better opportunity to obtain results and positive impact in alignment with our policies. The decision to engage with selected companies is based on our assessment of the significance of a particular matter, the size of holdings, the companies' performance compared to peers, scope to effect change, and opportunities to collaborate with other investors. This can also be a result of mapping portfolios to identify high-risk industries with the largest investment exposure against salient climate, biodiversity or human rights risks.

We set expectations for the companies we invest in and use our ownership position to influence the companies for improvement. We do so based on the principles and guidelines set out in our Sustainable Investment Policy. The policy emphasises that, on behalf of the unitholders for whom we manage capital, we must perform an ownership role in the companies in our portfolios where the execution of ownership is considered material financially, regulatory, or in terms of fiduciary duty. This ownership role must be performed in such a way that the interests of the unit holders are held foremost, for example by maximising the long-term value of the companies. This means that, in the event of any conflicts of interest related to the exercise of ownership rights and responsibilities, our corporate interests and those of our associated companies must always give way to the interests of the unitholders.

## Roles and responsibilities

Our Engagement and Voting Policy is approved by the Board of Directors in Storebrand Asset Management AS. The CEO of Storebrand AM, or the appointed representative, is responsible for ownership matters. Our Risk and Ownership team is responsible for: assessing which companies we should engage with; deciding whether and how we should express our opinions through voting; and conducting the engagement and voting activities that are involved in the exercise of our active ownership responsibilities.

Storebrand AM applies uniformity in its voting activities across its boutiques, subsidiaries, products and brands, not least relating to voting on meeting items concerning environmental or social matters. The framework for the use of voting rights deriving from shareholdings managed by the Storebrand Group is set out in regulation following the EU's Shareholder Rights Directives as well as related local regulations and industry recommendations.

Our Risk and Ownership team, in collaboration with CIOs and PMs, reports internally on activities and progress related to this policy, to the management of Storebrand Asset Management and Boards of Directors as required on a regular basis.

## Engagement principles

Five principles guide our approach to exercising ownership rights:

### 1. Creating shareholder value

We believe that companies that proactively manage sustainability risks and adjust their strategies and business models to embrace sustainable solutions will also create increased shareholder value over time. Thus, our clients' shareholder value also encompasses environmental, social and governance value.

### 2. Aiming for a positive impact

Ultimately, we aim for our investments to have a positive impact. Therefore, we not only engage with companies to require them to redress wrongs (reactive engagement), but also to lift sustainability standards proactively so as to address potential sustainability risks before they can become impacts, as well as to encourage good practices. Accordingly, we allocate more resources to these proactive engagements, engaging for long periods and, where possible, with other investors for more leverage and better results.

### 3. Leveraging our Nordic position

As a Nordic actor, we have more leverage when engaging companies in Nordic countries where we are well known and our exposure (size of holdings) can be high. We therefore prioritise our proactive engagement with Nordic companies, where our position and knowledge of these companies enable constructive and meaningful dialogue that creates value for these companies, Storebrand AM, and our clients. However, this does not limit us to only engage with Nordic companies. Aspects such as the materiality of ESG risks, exposure, and the ability to have greater impact on ESG issues remain important factors to consider in the prioritisation of our engagement work with companies outside of the Nordics.

### 4. Multi-stakeholder engagement

We understand that many sustainability issues cannot be solved by companies or investors alone; they require the involvement of other stakeholders. As a result, we engage with parties such as governments, industry organisations, environmental and human rights organisations or labour unions. In particular, we consider policy-level engagement an essential factor in stimulating change since we believe regulation is sometimes required to advance many sustainability issues.

### 5. Targeted engagement

We engage with companies on their sustainability practices, management of risks to people and the environment, developments in accordance with changing regulations, mitigating reputational risks, and expectations from their shareholders and society at large. In our experience, we achieve the best results through cooperation with other investors and, when engaging individually, through targeted engagement with companies where our ownership level is highest.

#### Engagement themes, goal setting and measurement

To maximise our impact, and based on a structured assessment, we periodically develop engagement themes that guide and focus our action. For the period from 2024–2026, Storebrand Asset Management has prioritised three individual engagement themes and two cross-cutting themes. The themes that we have prioritised align with the Sustainable Development Goals and with our own corporate commitments. The individual engagement themes cover certain environmental and social aspects of sustainability, while the cross-cutting themes address some aspects of governance and context necessary to enable sustainable investment. For 2024–2026, the individual themes are climate change, nature and human rights, and the cross-cutting themes are policy dialogue and sustainability disclosure. Please read more in Section 1 of the activities and outcomes report.

## Escalation of engagement

Within the process of engagement, escalation can mean that we take some or all of the following actions:

- Raising issues at Board level, if management is not responsive
- Expressing our views publicly, by issuing a public statement
- Cooperating with other investors, if not already doing so
- Proposing, submitting or co-filing resolutions at the AGM
- Voting against re-election of Board members concerned
- Placing a company on our observation list

## Voting

Our commitment to sustainable, long-term value creation drives us to actively exercise shareholder voting rights. This commitment is integral to our fiduciary duty, ensuring we safeguard shareholder interests and promote exemplary corporate management, particularly in environmental, social, and governance (ESG) aspects.

Our voting policy, which is adopted at Storebrand AM group level, is available on our website. Under this policy, voting rights and other rights deriving from shareholdings shall be exercised solely in the common interest of the unit holders, with the aim of ensuring the best possible risk-adjusted return for the unit holders.

Responsibility for voting is delegated to our Risk and Ownership team, which determines how to exercise the voting rights appropriately, together with the relevant portfolio managers. We have systems in place to identify, manage and document any conflicts of interest that may arise in the exercising of voting rights. Our procedure for handling conflicts of interest is set out in our company's guidelines for identifying and handling conflicts of interest.

## Reporting

Externally, Storebrand AM publishes, quarterly and annually, a Sustainable Investment Review containing data and additional contextual details of how we are performing our active ownership responsibilities, including engagement, voting and exclusions.

We also publish on our website a dashboard of our engagement activity via our engagement data provider Esgaia. Regarding voting, we disclose all our votes cast on our website via a feed to the proxy voting dashboard of our external service provider ISS.

Both the engagement and proxy voting dashboards can be accessed in the reporting and transparency section of our website: [Reporting & Transparency](#)

## 4. Portfolio Integration

All portfolio managers within Storebrand AM are responsible for integrating ESG according to their mandates, and work in close collaboration with the Risk and Ownership team. Storebrand AM manages investments within a broad range of asset classes and products. The approach to integration of sustainability in asset management may therefore vary across different mandates, including, but not limited to, these methods below.

### Risk rating

Storebrand AM integrates sustainability risk ratings in investment decisions to avoid or invest less in companies with high-risk sustainability ratings and prioritise or invest more in companies with low sustainability risk. The ESG Risk Rating feeds into the Storebrand Sustainability and Risk Score assigned to all the (listed) companies we invest in, and it is available for our portfolio managers to integrate in investment decisions. The idea is to move companies from high sustainability risk to low risk through active ownership and, where this is not possible, to move capital away from high sustainability risk companies to companies with lower sustainability risk. There may be local variations in the way risk ratings are applicable for different boutiques and asset classes.

### Sustainability and Risk Score

The score is used to optimise portfolios towards more sustainable companies and to calculate an internal fund rating. We calculate the sustainability score on over several thousand companies and base it on a scale of 0–100. The sustainability and risk score is the basis for a total weighted sustainability score given to our funds. Portfolio managers at Storebrand AM are able to access the score on several levels: Total Score, Risk Score, SDG Score, and scores for underlying themes within these building blocks, are all readily available. Implementation of the score is dependent on the style and risk profile of the fund/portfolio in question. The score can be used to better assess the ESG risk of a particular investment, for identifying companies with attractive SDG positioning, or for assessing the overall exposure on ESG risk and opportunities of a portfolio.

### SFDR Integrations

Since 2021, with the introduction of Sustainable Finance Disclosure Regulation (SFDR) in the EU, we have integrated the Principal Adverse Impacts (PAIs) identified in SFDR into our risk analysis for asset classes where data is available. There is an overlap between PAI indicators, and our general work carried out to mitigate risk. This has not changed our methodology to identify risk but has added a new dimension to further map, manage, measure, and mitigate adverse impact as more specific data is available. To further mitigate risk, Storebrand will sell assets from companies with a considerable risk of involvement in activities with severe negative impacts such as Principal Adverse Impacts (PAIs) as described by EU regulations, so-called risk-based sale of assets.

The integration of SFDR into fund management is reflected in the investment process, where portfolio construction and ongoing monitoring take into account SFDR-related considerations, including minimum thresholds for sustainable investments applied to relevant funds.

### Principal Adverse Impacts (PAIs)

Our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green). This traffic light system has been calculated based on a sector-based materiality assessment, for which thresholds have been set for what is considered green, yellow and red. As of this date, the PAI traffic light score has been calculated for the following indicators: GHG intensity, activities in the fossil fuel sector, violations of UN Global Compact and OECD guidelines, Board gender diversity, controversial weapons and deforestation. Other indicators will be included if we see that the data quality and coverage improve.

Some of the PAI indicators are binary, whereas some are more quantitative, for example GHG intensity. For the quantitative PAIs, the values of the 5th and 95th percentile will act as guiding numbers for establishing the red and green scores. PAI flags are calculated and made available in Bloomberg for all portfolio managers, together with other ESG-related information such as exclusions, green revenues, whether the company is classified as a sustainable investment under Storebrand AM's SFDR definition, sustainability scores etc.

How different fund products consider PAIs will differ, depending on the specific product (for example Article 8 and 9), and strategy (active or passive). PAI data has also been integrated into our trading system, so that when the managers make a trade, they can see how it affects the various PAI indicators at portfolio level. In order to further mitigate risk, Storebrand will sell its holdings in companies with a considerable risk of involvement in activities with severe negative impacts such as Principal Adverse Impacts (PAIs) as described by EU regulations, so-called risk-based sale of assets. PAI red-flagged issuers will be prioritised for potential engagement or risk-based sale of asset, if the adverse impact is particularly severe.

The Storebrand AM Principal Adverse Impact Statement is available on our website.

## B. Describe how your resources enable effective stewardship

### Your governance structure and how it enables oversight and accountability for effective stewardship

#### Ultimate Accountability

Ultimate accountability for stewardship at Storebrand Asset Management lies with the Storebrand Asset Management Board of Directors.

The Board is responsible for approving the Sustainable Investment Policy, and all other policies such as the Voting and Engagement Policy, on an annual basis and, through this, takes ownership of the overall framework governing stewardship activities. The Board of Storebrand ASA sets the group-level sustainability strategy and commitments, including those arising from Storebrand's participation in international initiatives such as the UN PRI. The CEO of Storebrand Asset Management is accountable for ensuring that these group-level ambitions are appropriately reflected in the Sustainable Investment Policy and that sufficient organisational resources, processes and controls are in place to deliver effective stewardship. Day-to-day execution of stewardship activities is delegated by the CEO to the Risk and Ownership team with the Head of Risk and Ownership having the overall responsibility, which operates within the governance framework established by the Board and senior management.



**Odd Arild Grefstad**  
Group CEO, Storebrand



**Lars Aa. Løddesøl**  
Strategic Advisor



**Brita Cathrine Knutson**  
CEO, Nortura Konserpensjonskasse



**Hilde Marit Lodvir Hengebøl**  
Senior Business Analyst, Storebrand AM



**Karsten Solberg**  
Senior Fund Analyst, Storebrand AM



**Sondre Gullord Graff**  
CFO, sensiBel

#### Governance

The figure to the right illustrates the responsibilities of the Storebrand AM management team, and the Board, with regards to sustainable investment policies and decision making, including stewardship. The Board of Storebrand ASA is responsible for the strategy for sustainability work in the Group. The Storebrand Group CEO shall ensure that asset owners and the asset manager have ambitions for sustainable investments in line with this strategy.

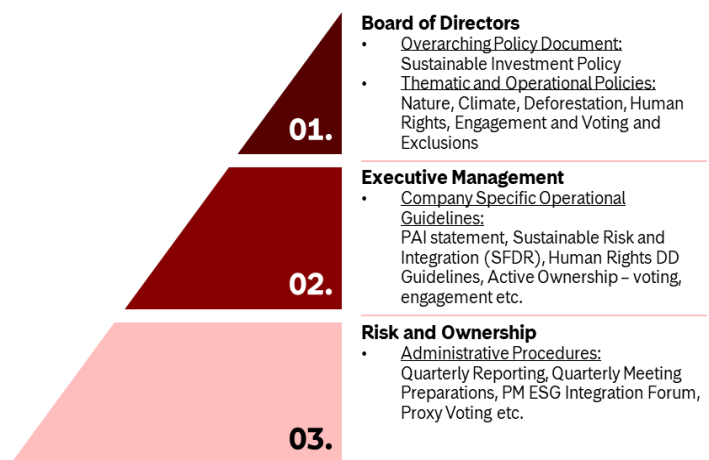


Figure 5: Storebrand AM Sustainable Investing Policy Governance Framework

The Sustainable Investment Policy, and the Thematic and Operational Policies, are drafted by the Storebrand AM Risk and Ownership team, with input from the Storebrand AM CIOs, the respective Heads of Sustainability for the various asset classes, and the Head of Sustainability at Storebrand ASA. They are approved by the Storebrand AM Board of Directors and are applicable to all assets managed on behalf of the Storebrand Group.

The Storebrand AM Board has appointed two committees to support its role:

1. Management and Control Committee

Assists the Board by reviewing, evaluating and, where necessary, proposing appropriate measures with respect to Storebrand AM's governance, overall controls, and risk management.

2. Compensation Committee

Assists the Board by monitoring the remuneration of executive personnel and proposes guidelines for fixing executive personnel remuneration, which is presented to the General Meeting annually. In addition, the Committee safeguards the areas required by the Compensation Regulations in Norway and Sweden.

Storebrand AM's Group Management team dedicates resources to integrate ESG risks into our analysis of companies and management of investment portfolios.

Our method for the exclusion of companies is defined by the Storebrand Exclusion Policy<sup>3</sup>, which applies to all assets managed by Storebrand AM. The exclusion process is extensive, involving external data screens and in-depth evaluations conducted by our sustainability analysts. The exclusion process is governed by the Sustainable Investment Committee, which meets once a quarter to decide on recommendations from the Risk and Ownership team for norm-based exclusions and whether companies should be included on Storebrand's observation list, excluded or reintroduced to the investment universe. The Exclusion Policy and the process for excluding companies are described in detail under Section A "Investment beliefs or stewardship strategy". As of the end of 2025, the Sustainable Investment Committee consists of senior managers from across the Storebrand Group.

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<sup>3</sup> [Storebrand Exclusion Policy](#)

Name	Position
Frederic Ottesen (Chair)	Head of Distribution, Private Markets, Storebrand Forsikring AS
Jenny Rundbladh	CEO, SPP Pension & Försäkring AB
Monika Rappe	Leader for SPP Tech, SPP Pension & Försäkring AB
Gunnar Heiberg	Chief Legal Counsel, Storebrand ASA
Vivi Måhede Gevelt	Executive Vice President Corporate Markets and CEO, Storebrand Livsforsikring AS
Jan Erik Saugestad	CEO, Storebrand Asset Management AS
Camilla Leikvoll	Executive Vice President, Retail and Senior Vice President, Storebrand Bank ASA

Table 1: Sustainable Investment Committee

The key focus of the Sustainable Investment Committee is analysing and reviewing cases for norm-based exclusion. Companies that are placed on the observation list require engagement and the committee must assess when active ownership has not yielded the desired result.

When companies are flagged due to breaches of our Exclusion Policy, such as environmental and human rights violations, we will always attempt to engage before excluding a company. Recommendations for exclusion are made following engagement and escalation efforts. The Committee is to handle cases related to the norm-based/conduct-based exclusion criteria that are of a serious nature and can be precedence setting for potential future exclusion cases. Cases that are objectively well documented and have clear precedence in previous exclusions are decided by the Risk and Ownership team after being raised through the Investment Office (comprising of the CIOs, CEO, the Chief Risk Officer in Storebrand AM, and the Head of Risk and Ownership). If the Investment Office is of the view that the case is not documented well enough or that it may be precedence setting, the case will be taken up to the Sustainable Investment Committee for decision. This makes stewardship more effective by improving the efficiency and transparency of decision making, ensuring breaches of our policies are addressed promptly.

The overall purpose of the Investment Office is to ensure the best investment offering to our clients in a sustainable, regulatory compliant, and cost-efficient way, and to ensure investment activities support the group strategy in the best possible way.

The key responsibilities include:

- To monitor and ensure a robust and efficient investment platform (systems, data)
- To track investment performance and follow-up/establish actions of improvement (process, team)
- To coordinate ESG integration
- To be a sounding board for conduct-based exclusions and to coordinate risk-based sale of assets
- To coordinate and prioritize active engagement

- To ensure a robust data infrastructure, selection and use of ESG data
- To prepare the Sustainable Investments Policy and supporting documentation for Storebrand AM Group approval
- To follow up status on the Must Win Battles (MWB) actions
- To drive investment-driven product innovation and adaptation of AI

Some of the key mandates include:

- To prioritize use of shared resources within the scope of the financial plan
- CIO and Head of ESG Risk and ownership have independent mandates

Some key reporting outputs include:










- Monthly Investment performance and ESG dashboard
- Board investment performance review, and Board presentations
- Input to financial and strategic process

The Investment Office meets on a bi-weekly basis, taking decisions regarding the organization and coordination of ESG data, polices, engagements, exclusions, targets and strategy.

### Your stewardship resourcing, including a description of the roles that undertake stewardship, and their responsibilities

The primary vehicle for the delivery of Storebrand AM's stewardship activities is the Risk and Ownership team, which sits within Storebrand AM. The team is responsible for stewardship actions relating to Storebrand AM's systematically and passively managed funds, and for working in close cooperation with Storebrand AM's portfolio managers on the actively managed funds. The team also carries a group-wide responsibility to manage common sustainable investment policies and actions for Storebrand AM.

The Risk and Ownership team is led by Kamil Zabielski, Head of Sustainable Investment, who reports to the CEO of Storebrand AM and is a member of the Investment Office. In 2025, Storebrand AM significantly strengthened its Risk and Ownership team, almost doubling its size from five to nine dedicated specialists to support increasing regulatory expectations and an expanded active ownership agenda.

-  **Kamil Zabielski**  
Head of Sustainable Investment
-  **Emine Isciot**  
Head of Climate and Environment
-  **Tuliá Machado Helland**  
Head of Human Rights
-  **Vemund Olsen**  
Senior Sustainability Analyst
-  **Victoria Liden**  
Senior Sustainability Analyst
-  **Karoline Hattestad**  
Senior Sustainability Analyst
-  **Georg Präauer**  
Senior Sustainability Analyst
-  **Daniel S. Olderkjær**  
Senior ESG Data Analyst
-  **Erik Högberg**  
Corporate Governance Analyst

The Risk and Ownership team includes senior analysts with complementary expertise across active ownership, proxy voting, human rights and international humanitarian law, climate, nature, corporate governance, financial crime and ESG data and analytics. The team enhances Storebrand

AM's capacity for company engagement, voting, exclusions, policy development, and integration of sustainability risks across portfolios, reflecting a deliberate investment in responsible ownership during 2025.

### Stewardship Resources and Responsibilities

The Risk and Ownership team is responsible for setting Storebrand AM's framework and principles for active ownership and commitments. Their subject matter experts are a key resource for sustainable investment policy design, governance and implementation. They are responsible for managing Storebrand AM's stewardship and exclusion activity, alongside portfolio managers, and for developing and overseeing implementation of portfolio sustainability screens.

The Risk and Ownership team selects the priority engagement themes for Storebrand AM, focusing on strategic long-term areas requiring proactive involvement. The themes are designed to run for a minimum two-year period, after which they will be reviewed, but reflect the strategic sustainability goals of the organisation and address material systemic issues for investors. The themes are also driven by our key areas of expertise and competence and our position as both a Nordic sustainable finance leader and international sustainability pioneer. Our engagement themes for the period 2024-2026 are outlined in Principle 1.

The Risk and Ownership team prioritises proactive cases for engagement based on the themes and our involvement in industry initiatives but must also address reactive cases involving investee companies that conflict with our sustainable investment principles. The team receives information about potential cases of interest, primarily from data suppliers, but can also take up cases for analysis based on news items and/or raised by clients or by other parts of the group (managers, communications, etc.).

### Additional Sustainability Resources

All employees at Storebrand AM have sustainability in their action plans to varying degrees and all portfolios are subject to a certain level of sustainability criteria. Many of our portfolio managers have sustainability-related mandates and specialisms. We have highlighted below some additional sustainability resources that engage in stewardship activity, both at a company level and a policy level:

The Risk and Ownership team collaborates closely with the investment managers, including the Global Equity team, to implement sustainability strategies across portfolios. This synergy ensures that sustainable investment practices are consistently applied and that relevant guidelines and policies are adhered to. Additionally, the Global Equity team, well-versed in both active and passive investment processes, is committed to sustainable investment practices, reflecting a robust integration of sustainability within their operations. Our quantitative equity team, of four portfolio managers, has deep insights into the use and impacts of ESG data and policy in portfolio

construction, due to their expertise and many years' experience of ESG data integration. This also feeds into our policy engagements and participation in industry initiatives.

The Global Solutions team is responsible for analysing sustainability data from a solutions-oriented perspective, identifying companies that deliver measurable contributions to environmental and social challenges, and managing Storebrand's dedicated solutions-based equity strategies. The team operates within Storebrand Asset Management and is focused on investing in companies whose products and services address key sustainability challenges aligned with the SDGs.

The team comprises four experienced investment professionals with complementary expertise across sustainability analysis, thematic investing and portfolio management and whose experience spans areas such as climate finance, smart cities, international economics and business administration. This breadth of expertise supports robust company analysis and informed investment decision-making. The investment universe is structured around four thematic areas: renewable energy (including energy production, storage and distribution), smart cities (water management, urban planning and mobility), circular economy (recycling, reuse, sustainable products and eco-design), and equal opportunities (access to financial services, digital services and healthcare). These themes provide a clear framework for identifying solution-oriented companies and for integrating sustainability considerations throughout the investment process.

Responsibility for voting is delegated to the responsible portfolio manager, or to Storebrand AM's Risk and Ownership team, who determines how to exercise the voting rights appropriately. Storebrand AM has engaged ISS as an independent proxy voting service provider and proxy advisory firm, through a specially chosen advisory policy that focuses heavily on sustainability issues. Storebrand AM's voting is governed by Storebrand AM's common voting policy and is always based on what is in the interest of the funds and of the unit holders.

#### **Any external service providers used to supplement internal stewardship resources**

Storebrand AM does not use any external service providers for conducting stewardship and engagement activities on our behalf. All stewardship activities are conducted in-house, including, where applicable, in collaboration with other investors via various investor alliances and coalitions. External resources are sometimes used as consultants, carrying out research or advising on specialty subjects, but this is on an ad hoc basis.

#### **Any systems or technology used to undertake your stewardship activities**

Storebrand AM invests heavily in systems, processes, research and analysis to ensure our stewardship standards are upheld. As a sustainable investing pioneer, we have progressed rapidly, adapting to new market conditions over the past 30 years. The market for sustainable investment data and analysis has grown markedly over that period and we have gone from creating our own ESG company profiles via direct Q&As, in the days before ESG ratings, to pivoting towards the best available external providers of such data. We seek the best possible data sources for assessing each required sustainability feature. Our expert resources can then put those external data sources to

use, objectively and independently, in portfolio construction and sustainability analysis. We continuously monitor the market and challenge our providers, our independence means we can change those providers if better options become available.

At present we use the following service providers:

- **Esgaia:** All company dialogues are tracked and logged in our system, Esgaia, where the results and ongoing progress of engagements are classified according to an internal scale. This system enables easy tracking and provides an overview of which dialogues have been conducted, with which companies, on which themes, and their outcomes. Specific goals for the engagement process are established before each engagement to ensure clear communication with investment targets and facilitate the measurement of engagement success. ESG analysts in the Risk and Ownership team record the success factor for each engagement process and coordinate with portfolio managers where relevant.
- **PowerBI:** Our internal interface for product level sustainability data and engagement. This system is used by client-facing employees to access verified sustainability metrics for clients. It can also be used to create reports on engagement activity at a fund level by topic.
- **Sustainalytics:** We monitor all companies in our investment universe (approx. 4,500) via Sustainalytics (product screen, controversies and global standards screen) to receive their ESG risk rating. This rating corresponds to up to 50 points out of the maximum of 100 points that we give to a company in our proprietary sustainability rating. We also access Sustainalytics Global Standards Screening (GSS) which identifies companies that violate or risk violating international standards under the UN Global Compact. Sustainalytics is also our supplier of taxonomy data and one of three suppliers of SFDR PAI data.
- **FTSE Russell:** Our supplier for data on 'green revenues', where income exposure for products that deliver environmental solutions is classified and measured. We use FTSE Green Revenues data in portfolio construction for some of our products. This data is also integrated into our sustainability rating.
- **ISS:** Used as the Group's supplier for proxy voting at general meetings internationally. We also use ISS (product, standard and controversy) as one of several providers to conduct ESG screening on exclusions, such as controversial weapons, tobacco, cannabis, alcohol, pornography, weapons, commercial gaming activities and exposure to fossil fuels. We also use the ISS Norm Screen which flags companies that violate the UN Global Compact.
- **Equileap:** Our supplier for gender equality data which is used in the Storebrand Sustainability rating and for reporting purposes.
- **S&P Trucost:** Our primary provider for corporate carbon emissions data. This is used in portfolio construction, for products that use optimisation for decarbonization, and is analysed for fossil fuel exclusions. Carbon footprint data is also a crucial element of our sustainability reporting to clients. S&P is also a provider of SFDR PAI data.
- **Stamdata by Nordic Trustee:** We use Stamdata to increase coverage of ESG data on Norwegian and Swedish companies, where our global data providers may have lower coverage.

Stamdata is one of three providers we use for SFDR PAI reporting, in addition to Sustainalytics and S&P Trucost.

- **Morningstar Direct:** Used to analyse and monitor the sustainability of internal and external funds, as well as collect fund holdings for external funds. It is not used for screening rather as a data check and for competitor analysis.
- **Bloomberg:** We use this as an ad hoc supplementary source, rather than for exclusions and ratings. Given ESG Ratings and corporate carbon emissions data, can vary materially according to provider, it is useful to have alternative sources for comparison.
- **InfluenceMap:** Used to inform the Storebrand climate policy which states that we will not invest in companies that actively oppose and lobby against the Paris Agreement and climate legislation, in addition to other norms and product criteria. Data on this is taken from InfluenceMap, which evaluates the extent to which a company works against regulations aimed at achieving the Paris Agreement.
- **Heartland Initiative:** Provides research and screening of our portfolios in relation to Conflict Affected and High-Risk Areas (CAHRA) for investee companies as well as pre-investment processes to support engagement and divestment processes.
- **Upright:** Used as input to the investment process for Storebrand's solutions focused active equity funds, which are centred on renewable energy, smart cities, circular economy and equal opportunities. Upright provides us with data-driven impact scoring across a range of metrics, assisting us in our company research and aim with SDG alignment.
- **Other:** For government bond exclusion we use publicly available sources such as Transparency International and The World Bank Worldwide Governance Indicators (data on corruption), UN Security Council sanctions lists and Freedom House (human rights). And for assessment of corporate emission reduction targets, we use publicly available data from SBTi.

## **C. Describe your stewardship policies and processes, and how you review them**

### **Organisational policies and/or processes that relate to stewardship**

Asset owners may implement more ambitious strategies regarding ESG in their investment mandates given to Storebrand AM, but all investment entities in Storebrand AM must abide by the Sustainable Investment Policy and the underlying Thematic and Operational Policies. Each entity is individually responsible for implementation of those policies within their own businesses and according to their distinct investment approaches.

Storebrand AM is governed by Storebrand AM Group Management, consisting of 8 people responsible for leading its key business areas and leaders from independent investment entities. This team is responsible for Storebrand AM's Company Specific Operational Guidelines for sustainable investing, voting and engagement, in line with the Sustainable Investment Policy and Thematic and Operational Policies.

The Storebrand AM Group Management team reports semi-annually to the Storebrand AM Board of Directors, which includes the CEO of Storebrand ASA, Odd Arild Grefstad. Storebrand AM's business unit goals and targets are reviewed four times a year by the management group and semi-annually by the Board of Directors in order to align investment strategy and culture with stewardship responsibilities and our long-term sustainable investment goals.

Storebrand AM's objectives are strategically linked to the Storebrand Group level objectives in that we deliver investment products to meet the sustainability commitments of the Group. We are aligned in our Group-wide commitments to net zero emissions by 2050.

The Storebrand AM Board is responsible for ensuring that the Asset Management Group works with, and reports on, sustainability in compliance with national laws, regulations, and regulations of the European Union. It also is responsible for overseeing that the self-imposed obligations and aspirations are met. The Board determines the responsibilities and tasks of the CEO with regards to sustainability and approves the organisation of responsibilities and tasks of Storebrand AM Group Management.

The Board follows up on the company's sustainability work through business area reports, as well as status, risk and compliance reporting from independent control functions and internal audit.

Responsibility for corporate governance of Storebrand AM's funds lies with the Storebrand AM Board of Directors. The daily execution is delegated to the portfolio managers of each fund, along with the Storebrand AM Risk and Ownership team (whose responsibilities are described below), and activities are reported back to the Board. The Board annually evaluates the execution of corporate governance and seeks to identify areas for improvement.

Storebrand AM's Sustainable Investment Policy, and all underlying policies, are approved by the Board of Directors of Storebrand AM.

### Stewardship central to implementation of Sustainability Policies and commitments

Storebrand AM's Sustainable Investment Policy sets the overall framework for all stewardship work, clearly outlining our high-level commitments and the expectations we have from investee companies on issues like Climate, Nature, Human Rights, and Deforestation. It also outlines the main methods and approaches we utilise in our stewardship work to mitigate or avoid risk as part of the due diligence in our portfolios, namely, screening and exclusions, engagement and voting, and integration into the investment decision making process.

The overarching Sustainable Investment Policy is supplemented by the underlying Thematic and Operational Policies which further outlines how Stewardship is more precisely implemented. These Policies consist of the following:

- Engagement and Voting Policy<sup>4</sup> (Operational Policy)
- Exclusion Policy<sup>5</sup> (Operational Policy)
- Nature Policy<sup>6</sup> (Thematic Policy)
- Climate Policy<sup>7</sup> (Thematic Policy)
- Deforestation Policy<sup>8</sup> (Thematic Policy)
- Human Rights Policy<sup>9</sup> (Thematic Policy)

As an example, the Engagement and Voting Policy provides further clarification on our Stewardship issues, such as; 1. how the we monitor investee companies in relevant areas, 2. how we engage in dialogue with investee companies, 3. the exercise of voting rights and other rights related to the shares managed on behalf of the unitholders of the Company's investment funds, 4. collaboration and communication with other shareholders and stakeholders; and 5. how the we handles conflicts of interest in relation to the exercise of ownership rights.

As another example, the Exclusion Policy outlines that Storebrand AM regards exclusion as a last resort in cases where companies fail to demonstrate the will to cease their practice, or to engage and improve. When companies breach our Exclusion Policy, Storebrand will in most cases first use its position as an investor to engage companies in dialogue and seek to make adequate

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<sup>4</sup> [Engagement and Voting Policy 2026](#)

<sup>5</sup> [Exclusion Policy 2026](#)

<sup>6</sup> [Policy on Nature 2026](#)

<sup>7</sup> [Climate Policy 2025](#)

<sup>8</sup> [Deforestation Policy 2026](#)

<sup>9</sup> [Human Rights Policy 2026](#)

improvements to end these breaches. If dialogue and further escalation measures do not lead to positive changes, a company may be excluded from investment. The Policy further clarifies the precise criteria for exclusions with regard to both conduct based exclusions (such as serious human rights violations) or product-based exclusions (such as for coal, oil sands, tobacco, etc.)

The Thematic Policies, more granularly elaborate our principles, commitments and implementation of Stewardship for that theme. For example, the Human Rights Policy lays the basis for our human rights commitment and our human rights due diligence process – allowing us to effectively and systematically implement stewardship on the topic of human rights. It covers aspects of monitoring and screening of our portfolios for human rights risks, how we manage and mitigate these risks through good stewardship; engagement, voting and integration of risks into investment decisions.

### **Policies – Frequency and the process for review and approval**

The stewardship framework and Sustainability policies at Storebrand AM is subject to ongoing review to ensure that stewardship activities remain effective, well governed and aligned with regulatory requirements, client expectations and the firm’s sustainability commitments. Review of the stewardship process is embedded within the firm’s overall governance structure and is conducted at multiple organisational levels, combining Board oversight, senior management responsibility and operational monitoring.

At the highest level, ultimate oversight of the stewardship process rests with the Storebrand Asset Management Board of Directors. The Board reviews the Sustainable Investment Policy, and all related policies, such as the policies on Human Rights, Climate, Nature, etc. on an annual basis or as needed, and through this process assesses the overall stewardship framework, including the principles, policies and governance arrangements that underpin engagement, voting and exclusion activities. This annual review process provides a formal mechanism for reviewing whether the stewardship approach remains appropriate, sufficiently resourced and aligned with the firm’s stated sustainability objectives. If the revision process results in proposals for substantial changes, the policies will be raised to the Board for policy clarification and formal approval and adoption.

### **Stewardship Process and Actions**

Our stewardship approach comprises proactive (both individual and collaborative) and reactive engagements, and voting.

We set our core engagement themes for a period of 2-3 years, after which they are reviewed and refreshed if necessary. Our engagement themes are generally tackling long-term challenges, so they remain fairly consistent but are adjusted as necessary for effectiveness. During 2024 we set our new engagement topics for the period 2024-2026, these topics are explained in Principle 1.

Storebrand AM defines and sets objectives and milestones for its engagements to be achieved by companies, either individually or together with other investors in collaborative engagements. These

objectives, as well as any progress on engagements, are recorded in our internal engagement tracking system, Esgaia.

The Risk and Ownership team discusses the progress of ongoing engagements in its weekly meetings; engagement is assessed and discussion of escalation is covered (further information available under Principles 3). Storebrand AM monitors progress against defined objectives and tracks the progress of action. If the original objectives are not met, an assessment is made as to the appropriateness of the original objective and methods for engagement. If the original objective needs revision, we will do so or if the unachieved objective is process-rooted, then remediation will be exercised.

### Stewardship Reporting

We ensure our stewardship reporting is fair, balanced and understandable through the following efforts:

- Keeping sustainability experts and the communication team in regular and detailed contact.
- Communicating openly with our clients and asking for feedback. We have clients that are also reporting in line with the UK Stewardship Code so it is important that we are aligned with their requirements.
- Communicating with rating agencies on our level of transparency.

Our internal reporting tool, PowerBI, is an interface which anonymises our engagement cases in Esgaia but provides reporting of total engagements according to category and product. Our client facing colleagues can use this to create reports and can reach out to the Risk and Ownership team for company specific examples, where required.

In our Quarterly Sustainable Investment Review (SIR) publication, we cover progress on engagements, sustainability initiatives in which we are involved, voting activity and any new exclusions or engagement escalations during the period. This is published on our website quarterly and ensures we regularly assess, refine and communicate our stewardship progress and processes

For example, in the Q1 2025 SIR we described how our internal pre-screening of companies with high human rights risk in Gulf region high-risk countries led to 14 companies across extractives, construction, communication, and IT were formally rated as uninvestable – meaning portfolio managers were pre-emptively notified that these companies would not meet Storebrand's sustainability standards, even without existing holdings. The screening was conducted in-house using specialist data provider on Conflict-Affected and High-Risk Areas (CAHRA).

Another example is a change made to our screening for SFDR PAI 10, which we described in our Q3 2025 SIR. As a response to our data providers no longer assessing violations of human rights or International Humanitarian law in occupied territories, we have developed an in-house system for heightened due diligence on companies operating in Conflict-Affected and High-Risk Areas (CAHRA). As part of this due diligence, companies on authoritative UN lists are automatically flagged as a SFDR PAI 10 breach, which make them non-investable in Art. 9 funds and as share of sustainable investment in Art. 8 funds. This applied to 158 companies on the UN Human Rights Office list released 26 September 2025.

## Assurance Processes

### Internal Assurance of Governance Related to Active Ownership

During 2025, our Head of Sustainable Investments undertook a full review of our active ownership approach as part of the Storebrand AM sustainable investing policies and governance review. This process was supported by Storebrand AM Compliance, who provided advice on the governance process related to the review and revision of sustainable investment policies and adoption of thematic policies, as well as the ongoing governance structure of these policies and related decision making. Policies are reviewed for potential improvements and changes, as well as approved by the Storebrand AM Board, on an annual basis. If the revision process results in substantial changes, the policies will be raised to the Board for policy clarification and adoption.

### External Audit of Controls - ISAE 3402

Our stewardship policies and practices have stood up to external scrutiny. PwC are the current external auditor of Storebrand AM and provided an independent service auditor's assurance report on the description of controls, their design and operating effectiveness for the period from 1 October 2024 to 30 September 2025 via our latest International Standards for Assurance Engagements (ISAE) 3402 – type II report.

Our ISAE 3402 report addresses our organisational commitment to sustainability and explicitly references our principles for active ownership

### External Assurance via PRI

Storebrand was a founding signatory to the PRI (Principles for Responsible Investment) in 2006. Our stewardship activity is therefore assessed on an annual basis by PRI, which includes specific questions related to signatories' stewardship activities in the reporting period. The assessment aims to identify how signatories can improve their responsible investment practices and facilitate learning and development by outlining how signatories' implementation of responsible investment compares year-on-year, across asset classes, and with peers at the local and global level by providing a confidential report. To ensure transparent communication, and to let stakeholders follow up on the implementation of our Sustainable Investment policy, we are committed to fulfilling PRI's reporting requirements and publishing our results accordingly. After each reporting cycle, we perform a gap analysis to consider how we can improve our stewardship and sustainable investment practices.

After submitting full and comprehensive reports to the PRI in 2024 and 2023, in 2025 Storebrand AM was not required by PRI to complete a full reporting cycle, but only a minor update. That means PRI did not produce an Assessment Report for 2025, but our 2025 Transparency report is published on our website<sup>10</sup>, along with our 2024 PRI Assessment Report, which remains the most recent scored assessment.

A full PRI reporting and assessment cycle will be completed in 2026.

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<sup>10</sup> [Storebrand Asset Management's PRI 2025 Transparency Report - Storebrand Asset Management](#)

<b>Indicator</b>	<b>2024</b> (out of 100)	<b>2023</b> (out of 100)
Policy Governance and Strategy	94	92
Direct – Listed Equity Passive Equity	100	100
Direct – Listed Equity Active Quantitative	100	100
Direct – Listed Equity Active Fundamental	100	100
Direct – Fixed Income – SSA	94	94
Direct – Fixed Income – Corporate	95	95
Direct – Fixed Income – Private Debt	90	90
Confidence Building Measures	100	90

Table 2: PRI Assessment Summary Scorecard 2024

Our sustainability work is continuously assessed and ranked against our competitors, by civil society such as Fair Finance Guide Norway, or Norwegian People’s Aid. Our work is also assessed and ranked by leading financial advisers and intermediaries in insurance and financial products, such as Söderberg & Partners.

The Fair Finance Guide in Norway rates Storebrand as number 1 asset manager, indicating high-quality corporate social responsibility, ethics and sustainability.

Regular and consistent review and use of external assurance have led to the continuous improvement of our stewardship policies and processes.

Storebrand achieved a total score of A - in the CDP's 2025 disclosure. CDP is a global rating of companies on climate and nature related issues. In the 2025 disclosure, Storebrand maintained its A- score on climate, and improved its Forest score from B to A-. CDP rates companies’ work and achievements on climate and nature using a scale from A to F, with A being the top score. The foundation for the CDP's assessment is a comprehensive questionnaire that provides high levels of disclosure on governance, strategy and climate performance, among other topics.

### Service Provider Monitoring

Service providers are the subject of continual review to ensure services are delivered to our standards and meeting our needs. Each service provider is internally assigned to one person for regular meetings and follow-up. There is also a coordinated effort between the Risk and Ownership team and the IT team to compare and rate different providers. Our internal processes are designed to ensure the service provider fits our needs, providing quality and accuracy. We also ensure that all of our data providers meet the EU disclosure requirements.

As we regularly deal with pension funds, we receive many requests from clients about our choice of data service providers and how we expect to be responsible stewards of their funds; this ensures we regularly communicate the reasoning behind our choice of service providers and holds us regularly accountable for our decisions.

Alongside our systematic monitoring, we also assess any standout cases, for example in the advent of company controversies. We have regular contact with data providers if our own assessment does not match their evaluation and risk categorisation to understand the discrepancies and to eventually

provide additional information for them to consider. This is also the case when we receive conflicting information from various data providers.

Data governance is evolving as we continue to develop our inhouse governance; we aim to manage all data in enterprise systems. In this regard, we have streamlined the entry point of contact for all data service providers, with Head of Data Contracts & Data Governance. We are in the process of standardising the data and structure of agreements to have master service agreements, with data contracts handled in a centralised manner across Storebrand Asset Management. Data Governance works closely with Tech Governance - Delivery management as part of the Investment Operations unit. In 2025 we established an interdisciplinary ESG Data team, charged with developing comprehensive ESG intelligence for informed decision-making at every level of the organization. The team has participation from Digital Storebrand AM, Investment Control and Analytics, Client Reporting and Accounting, Risk and Ownership, Fund Product and Legal.

#### Engagement with service providers:

Our stewardship is supported by several service providers, including several ESG data vendors and proxy voting service providers. We regularly engage with ESG data providers to stay abreast of new data offerings, assess data quality, communicate our data needs and encourage improvements.

We use numerous data providers which creates challenges such as:

- different methodologies, e.g. more weight in the ESG risk evaluation assigned to financial risk vs material ESG risk
- different definitions, e.g. what constitutes production and distribution of a certain product
- different interpretations of what is considered a red flag for norm-based breaches, e.g. what constitutes a breach of UN Global Compact or the OECD MNE Guidelines
- data lags, e.g. outdated data on revenue from the production or distribution of oil sands or coal

Assessments and recommendations regarding a specific company may differ depending on what data provider one uses, as well as may differ from the methodology and approach that we apply in accordance with our own exclusion policy.

We are therefore constantly challenging our data providers when we see inconsistencies between data providers' assessments or with our own analysis based on dialogue and information from companies.

#### Challenging providers on company specific assessments

We have challenged providers that have flagged companies on product-based screening for involvement in "controversial weapons," and thereby a breach of PAI 10 (UN Global Compact and OECD MNE Guidelines), when their assessment differs from other providers and where we question their methodology for such a conclusion that would otherwise lead to an exclusion.

We find that data providers occasionally reach different conclusions on norm-based breaches and what constitutes a red flag and breach of PAI 10 (UN Global Compact and OECD MNE Guidelines). For example, a red flag and breach have been allocated to subsidiary companies for a controversy

that has been caused by the parent company and where the subsidiary has no involvement, contribution, or ability to influence the parent company.

We sometimes disagree with a provider's assessment that a company is not taking sufficient measures to cease or mitigate the measures triggered by a controversy. This typically occurs when the data provider is unable to come into dialogue with a company, or where we may be in an existing engagement with the company and have information that indicates a different conclusion from that reached by the provider. In these instances, we challenge our providers on their assessments, share information where we can, ensuring it would not jeopardise our on-going dialogue, and make an informed conclusion based on our own analysis. At times this may mean that we go against the decision of the provider, but we stand by our internal analysis and explain these cases to our clients. Usually, our clients appreciate this informed analysis and in-depth approach and understand our deviation from the provider.

#### Challenging established processes for using external providers

Our ambition is to make independent judgments based on our own analysis, in-house expertise and experience, rather than relying solely on the recommendations provided by our various third-party data providers- which can vary greatly in their methodology and conclusion – especially with regard to social issues.

## **D. Describe how you manage stewardship-related conflicts of interest to put the best interests of clients and beneficiaries first**

### **Your stewardship-related conflicts of interest policy**

Our approach to managing stewardship-related conflicts of interest is anchored in Storebrand's Code of Conduct<sup>11</sup> and Storebrand AM's Guidelines for handling conflicts of interest. Together, these frameworks set clear expectations for employee behaviour and provide a structured process to identify, prevent, manage and, where necessary, disclose conflicts, ensuring that stewardship decisions are taken in the best interests of clients and beneficiaries. Storebrand's Code of Conduct underpins our approach to stewardship, governance and responsible business, promoting integrity, transparency and accountability across the organisation and its interactions with Board members, suppliers and business partners. It addresses key stewardship-relevant areas including conflicts of interest, financial crime prevention, respect for human rights and labour standards, environmental responsibility, data protection and digital trust, and a culture that encourages openness and speaking up. Ethical conduct and sustainability are embedded across Storebrand's operations and decision-making in line with international standards, supporting effective oversight, trust and the delivery of sustainable long-term outcomes for clients and wider stakeholders.

Our conflicts framework applies to all stewardship activities conducted by Storebrand AM, including issuer engagement (direct and collaborative), voting, escalation, exclusions/observation decisions, and related communications with clients and other stakeholders.

### Governance and accountability

The CEO has overall ownership of the conflicts-of-interest framework<sup>12</sup>. The Head of Corporate Administration is responsible for facilitating the maintenance of the relevant guidelines and the conflicts register, including annual review. Compliance provides independent oversight, including monitoring that conflict of interests is identified, assessed, documented and managed in line with the guidelines, and reporting material matters to senior management and the Board as required.

The guidelines intend to help Storebrand AM organise and manage its activities in a way that reduces potential conflicts of interest to the greatest extent possible, contributes to establishing satisfactory internal control measures to identify and manage conflicts of interest, including specifying measures and deadlines for their implementation, and to manage conflicts of interest in a manner that safeguards the interests of its clients in the best possible way. In addition to complying with legislation and licensing requirements that apply, it is important that all employees

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<sup>11</sup> [Ethics in Storebrand - Code of Conduct](#)

<sup>12</sup> [Guidelines for handling conflicts of interest](#)

have the necessary expertise to identify possible conflicts of interest so that these are handled in accordance with our guidelines.

What we mean by “stewardship-related conflicts”: These are situations where our ability to act solely in clients’ best interests could be (or could appear to be) influenced when we undertake engagement, voting or escalation. They may arise due to relationships within the Storebrand Group, differing client expectations, personal interests of employees, or participation in collaborative initiatives.

Conflict categories covered by our guidelines include:

- Conflicts between clients (including between different funds/portfolios and client types)
- Conflicts between Storebrand AM / the Storebrand Group and clients (including other group relationships)
- Conflicts between employees (or employee representatives) and clients (including personal holdings and other interests)
- Conflicts between roles and functions (including different legal and operational responsibilities across the Group)

Core principles: We treat clients and portfolios fairly and consistently. Where a conflict cannot be prevented, we apply controls so that the interests of clients and beneficiaries take precedence over the interests of Storebrand, its employees and associated persons. Where a conflict remains material despite controls, we provide appropriate disclosure in a durable medium (for example in fund documentation or client agreements), assessed from the client’s perspective.

Whole-portfolio stewardship to support consistent treatment: The Risk and Ownership team sets stewardship priorities and voting positions for Storebrand-branded funds in scope and undertakes engagement and voting on behalf of the relevant assets under management, in line with our Sustainable Investment Policy and thematic policies. We do not operate a separate “ESG sleeve”; baseline exclusions and stewardship expectations apply across strategies. This consistency reduces the risk of conflicts arising from offering contradictory stewardship outcomes to different clients invested in pooled funds.

Client input: Clients may share views or information ahead of an AGM. We consider such input as part of our analysis; however, voting decisions are taken in accordance with our policies and our assessment of clients’ best interests overall. Clients cannot direct us to vote contrary to policy, as this would create inconsistent treatment across pooled vehicles and could undermine our ability to deliver our stated stewardship commitments.

Differing client requirements: Some clients and jurisdictions apply additional sustainability requirements (for example extended exclusions criteria). Where we offer products with more ambitious sustainability constraints, these are implemented at product level and documented

transparently. Our governance aims to ensure that such differences do not create conflicts in day-to-day stewardship by keeping a common baseline (policies and minimum standards) and ensuring any additional constraints are applied consistently to the relevant product set.

Roles in managing stewardship conflicts: The Risk and Ownership team is responsible for identifying and managing conflicts that may arise in the context of engagement and voting (including collaborative initiatives), and for escalating potential conflicts to Compliance and senior management where needed. Portfolio managers support this process by sharing relevant issuer and holding context and by observing any restrictions applied (for example trading restrictions linked to observation lists or insider status).

Scope and segregation within the group: This report covers Storebrand-branded funds managed directly by Storebrand AM. Other investment entities within the Storebrand AM group may have separate stewardship processes reflecting their mandates; where relevant, governance arrangements are designed to avoid inconsistent outcomes and to manage potential conflicts across entities.

#### How we identify, assess and manage conflicts

We use a consistent process to manage stewardship-related conflicts:

1. Identify potential conflicts (for example before accepting coalition roles, initiating escalations, or finalising sensitive votes).
2. Assess materiality from the client perspective (nature of interest, likelihood, and potential impact on stewardship outcome).
3. Apply controls (see below) with clear ownership and timelines where relevant.
4. Escalate to Compliance/senior management when the conflict is material, complex, or cannot be adequately mitigated.
5. Document the conflict, assessment and controls in the conflicts register and keep records of decisions.
6. Disclose where appropriate if a material conflict remains despite controls.
  - Equal treatment of customers/portfolios/funds
  - Subscription and redemption of units
  - Order timestamping
  - Aggregated orders
  - Anonymisation of customers
  - Internal trading
  - Pricing of financial instruments
  - Pricing of funds

## Inside information and information barriers

Stewardship activities sometimes involve receiving non-public information during issuer dialogue. We seek to avoid being placed in possession of inside information without prior agreement and appropriate controls. Where there is a risk that information could be inside information, we clarify this with the issuer (where possible) before receipt and involve relevant internal control functions as needed.

To manage information risks, we apply information barriers and access controls. Engagement records are restricted to those who need access for stewardship and investment decision-making, and we limit internal distribution of sensitive engagement details. Where necessary, additional restrictions may be applied to relevant personnel to ensure compliance with applicable market abuse rules.

## **Examples of real or potential conflicts related to stewardship and explain how you would manage them**

### Examples –Stewardship Conflicts

We have provided below some examples of stewardship conflicts. Some of these are live examples from the reporting period but due to sensitivities they are anonymised. Other examples relate to potential conflicts, or previous conflicts, which we must remain cognisant of and manage appropriately.

#### 1) Collaborative engagements and coalitions

1. Conflict trigger: Different coalition members (or their wider groups) may have other business relationships or exposures that influence their preferred engagement stance.
  - How we manage it: We discuss potential conflicts early within the coalition, seek external expert input where helpful, and agree engagement objectives and escalation parameters upfront.
  - Decision rule: If alignment cannot be reached, we may continue bilaterally or pursue a different collaborative forum, while maintaining our own policy-based expectations.
  - Transparency: We follow the initiative's reporting rules and our own disclosure obligations; where these differ, we decide whether to participate, seek agreed flexibility, or report through alternative formats (for example anonymised aggregate reporting).

#### 2) Proxy voting and service providers

Conflict trigger: Proxy service providers may offer multiple services (for example research, data and other solutions) that could create perceived conflicts in recommendations.

How we manage it: Voting decisions are made internally in accordance with our policies. We use external providers for operational support and research, but we maintain internal review and challenge. A designated member of the Risk and Ownership team oversees voting activity, and the team reviews environmental and social proposals against policy positions and issuer context.

Illustrative example: We have, where aligned with our policies and assessment of long-term risk, voted against a proxy adviser recommendation. For example, we vote against financial statements or the re-election of directors at companies we identify as “climate and forest laggards”, based on an internal assessment of the credibility of these companies’ management of climate and deforestation risk, and or failure by the company to meet our expectations on climate, or lack of progress in our engagements. These votes are in some cases not aligned with the recommendations of proxy adviser.

### 3) Managing sensitive engagement information

Conflict trigger: Sharing detailed engagement content too widely (internally or externally) can create information risks and could undermine the effectiveness of engagement.

How we manage it: We balance transparency with confidentiality by providing aggregated reporting and selected case studies where this does not compromise the dialogue. Access to detailed engagement records is limited. Where engagement information could influence investment decisions inappropriately, we apply additional controls and escalation.

Independence: The Risk and Ownership team is responsible for decisions on engagement direction and escalation. Portfolio managers contribute investment context and implement any restrictions, but stewardship escalation decisions are taken within the stewardship governance framework.

### 4) Exclusions and escalation decisions

Conflict trigger: Decisions to place an issuer on an observation list or exclude it can be sensitive where the issuer is widely held, strategically important, or has implications for multiple products.

How we manage it: Our exclusion criteria apply consistently irrespective of holding size. In some cases, we may sequence escalation tools (for example intensifying dialogue, seeking collaborative leverage, using voting or filing shareholder resolution as escalation) before recommending exclusion; this is to ensure due process and maximise the likelihood of achieving change. Decisions and rationale are documented.

Related consideration (business relationships): Where the Storebrand Group has other relationships with an issuer through its other business arms such as banking, insurance, real estate, etc. (for example as a supplier or counterparty), we treat this as a potential conflict and maintain

that stewardship decisions remain being policy-based and appropriately escalated and documented.

#### 5) Commercial pressure from clients

Conflict trigger: A client may request that we divest or exclude an issuer immediately due to controversy, potentially linking the request to retention of the mandate.

How we manage it: We explain our policy-based process (fact-finding, engagement, escalation and, where warranted, exclusion) and apply it consistently across relevant products. We do not change stewardship decisions to retain business were doing so would disadvantage other clients or undermine the integrity of our stated approach. In some instances, maintaining this consistency may result in the loss of a mandate; we accept this outcome to protect clients' best interests overall and the credibility of our stewardship framework.

Example: There have been cases where clients have been displeased of certain exclusions, such as our decision to exclude Toyota on account of anti-climate lobbying activities, and the tracking error/ impact on the respective fund's returns attributed to this exclusion. In several cases where this has been an issue, we have more thoroughly explained to the client the process and rationale behind the exclusion decision and our climate lobbying exclusion criteria. In these cases, the clients gained confidence in the decision after further understanding the facts in the Toyota case, the multi-year engagement efforts we took with the company for transparency in the lobbying activities, our escalation efforts co-filing a shareholder resolution on the topic at the company's AGM, and the rationale behind our exclusion decision when escalation measures have been exhausted.

## E. Describe how you maintain a dialogue with clients and/or beneficiaries

### The methods you use to share information about your stewardship activities and to gather feedback from clients and beneficiaries

#### Report for Authorities on Stewardship-Related Work

The Norwegian Transparency Act (Åpenhetsloven) requires large companies operating in Norway to carry out annual human rights due diligence and publish a report by June 30. Companies must also respond to public requests for information. The Act aims to help organizations identify and manage risks related to fundamental human rights and fair working conditions across their supply chains. Further details about the 2025 report can be found in the section on Activities and outcome in Principle 3.

#### Communication with Clients:

Storebrand AM is committed to ensuring that reporting on the impact of its investments and engagement results is communicated through a range of channels, including dedicated websites, client newsletters, annual reports, quarterly sustainability and fund reports, as well as external presentations.

We are open about our sustainability efforts and report in accordance with leading reporting standards, including the Global Reporting Initiative (GRI), Task Force on Climate-related Financial Disclosures (TCFD), Task Force on Nature-related Financial Disclosures (TNFD), and CDP. Strategic ambitions, specific goals, and sustainability reporting are key elements of our approach, and our Sustainable Investment Policy and underlying thematic policies set out how implementation and reporting are carried out.

Storebrand communicates stewardship and investment activities and outcomes across a variety of formats and timeframes. This includes regular updates such as annual client conferences, quarterly fund update webinars where portfolio managers provide detailed commentary, quarterly sustainability reports, carbon footprint reports, excluded companies reports, and monthly fund factsheets via Morningstar and Climate Metrics reports. Voting activity is published on our website in real time and, for UK clients, is also captured in the standard PLSA voting report. In addition, we provide ad hoc updates through blogs and whitepapers, social media, external presentations, and both in-person and virtual meetings.

The primary vehicle for communicating stewardship outcomes to institutional clients is the annual **Sustainable Investment Review (SIR)**, which provides a comprehensive account of Storebrand AM's sustainability and stewardship activities. This is supplemented by quarterly SIRs – shorter, thematic publications that provide updates on engagement campaigns, policy developments, voting activity, and exclusion decisions – ensuring that clients receive both a high-level overview and regular updates throughout the year.

For clients requiring more granular, fund-specific reporting, Storebrand AM provides dedicated ESG reporting through PowerBI dashboards, enabling access to portfolio-level sustainability data, including carbon footprint metrics, ESG scores, alignment with the UN Sustainable Development Goals, and exposure to excluded sectors.

Individual client meetings – conducted by both the Risk and Ownership team and the sales and client relations teams – provide opportunities for bilateral dialogue on stewardship priorities and outcomes. These meetings allow clients to raise specific concerns about companies, sectors, or thematic issues, and to receive tailored updates on engagement progress. Storebrand AM also hosts and participates in seminars, conferences, and webinars where stewardship themes are discussed with a broader audience of clients, prospects, and industry stakeholders.

### Gathering client feedback

Over half of Storebrand AM's AUM is internal capital managed on behalf of Storebrand Group companies. As our primary stakeholder, it is important that we align our stewardship goals with the needs of the Storebrand Group as Asset Owner. As outlined in Section C, Storebrand AM's objectives are strategically linked to Group-level objectives, ensuring that we deliver investment products aligned with the Group's sustainability commitments.

Revision of Storebrand AM policies, position papers, and targets (such as climate targets) is undertaken in dialogue and close consultation with the Group and the Head of Sustainability. This ensures alignment between Storebrand AM as asset manager and the Group as asset owner, while recognising that the asset owner may have additional expectations. Through this process, a stewardship strategy is established that aligns commitments while allowing flexibility for the asset owner to go further where appropriate.

This collaboration is formalised through weekly consultation meetings involving senior representatives, including the Head of Sustainability for the Group, Head of Sustainable Investment, CIO, and other relevant stakeholders. These meetings provide a structured forum for coordinating policy updates, target setting, and broader strategic decisions, ensuring alignment across the organisation ahead of Board-level decisions.

External clients choose Storebrand AM for our focus on long-term sustainability and our holistic approach to stewardship. We engage and vote across all AUM in line with our sustainable investment policies and long-term targets, making transparency and client alignment essential. We aim to maintain a two-way relationship with clients, responding to evolving expectations while remaining consistent in our approach.

Feedback from external clients – gathered through client meetings, surveys, and ongoing interaction with client-facing teams – is consolidated and fed into the organisation through formal governance structures. The Client Group, led by the CEO, provides a forum for discussing client needs and ensuring these are reflected in business and stewardship priorities.

Storebrand AM also operates a platform through which external asset managers' funds are made available to clients. The Fund Selection team is responsible for the selection, monitoring, and oversight of these funds and plays a role in gathering sustainability-related feedback from external managers.

### **Incorporation of feedback into stewardship**

Our approach to client dialogue is designed to ensure that stewardship activities are communicated clearly, that client expectations are understood, and that feedback is systematically incorporated into our stewardship strategy.

Storebrand AM treats client and stakeholder feedback not merely as a communication obligation but as a substantive input into the evolution of its stewardship approach. Feedback gathered through client surveys, meetings, and stakeholder analysis feeds into the Risk and Ownership team's internal review process, including the annual update of the Sustainable Investment Policy and thematic priorities.

In practice, client feedback has influenced Storebrand AM's stewardship approach in a number of ways. Client demand has shaped the thematic priorities of engagement programmes - for example, increased interest in nature-related risks contributed to the expansion of biodiversity engagement and the development of the Nature Policy. Feedback has also led to strengthened due diligence and risk assessment processes, as well as adjustments to screening and exclusion approaches.

Storebrand AM applies this feedback loop to its oversight of external fund managers. The Fund Selection team gathers sustainability-related feedback through structured assessments and ongoing dialogue, and insights from this process are used to refine expectations, inform engagement priorities, and improve stewardship practices.

Storebrand AM is committed to closing the feedback loop: where clients raise specific concerns or suggestions, we respond either by explaining our approach or by incorporating feedback into future stewardship activities. We recognise that dialogue between asset manager and client is most effective when it is substantive, specific, and two-directional.

## Activities and Outcomes Report

We believe that companies that are well-positioned to deliver on sustainability opportunities and that manage underlying sustainability risks, such as those associated with environmental, social, and governance matters, will be more robust and better positioned to help us deliver the best risk-adjusted long-term financial returns for our clients in a responsible manner.

Integrating sustainability in investments and exercising responsible stewardship is essential to identify the risks and opportunities arising from environmental, social and governance factors, such as climate change, biodiversity loss, human rights and social inequality, and safeguarding institutions and legal rights. Integrating these sustainability factors into our investment process and overall stewardship allows us to make better informed investment decisions. Moreover, through our Stewardship work we contribute to better sustainability practices by individual investee companies, to addressing sector wide and systematic risks, and to policy alignment that provide the framework and incentives for companies to be more sustainable.

Storebrand will in most cases first use its position as an investor to engage companies in dialogue and seek to make adequate improvements to end these breaches. If dialogue and further escalation measures do not lead to positive changes, a company may be excluded from investment.

As both an active and passive index investor, there are limitations as to the degree of leverage we as minority shareholder investor can have over a company to influence, alter or cease certain practices. This is most limited when in investing in global index markets where our ownership in any particular investee company is insignificant for the company. This means that our Stewardship approach is dependent on a wholistic strategy to prioritise and target key systemic and material risks for us as investors and for planet and people. The approach recognises that effort is required not only on a company level, but also on a sector, geographic, and policy level, and that combined these efforts can contribute to change, albeit not quantifiable and often without a one-to-one casual link to our stewardship actions.

### **1. Signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries**

**Describe the key themes or issues that are important for your stewardship activities and how you have prioritised them**

Based on the principles set out in our investment and sustainability strategy, we engage with many companies each year, seeking to influence them to move in a more sustainable direction. We use our position as owners to influence companies to improve corporate behaviour and reduce adverse sustainability impact. Through active ownership in this way, we aim to reduce risks, improve the quality of our investments and influence companies to move in a more sustainable direction.

We believe in a combination of engagement and voting, screening and exclusion, and inclusion and integration. Screening and exclusions are steps in our implementation of due diligence to identify, manage and mitigate actual and potential adverse impacts in our portfolios. If companies are unable or unwilling to mitigate adverse impacts to the required level, we consider divestment. Engaging with companies happens on different levels, including management and Board levels, and can be both direct individually and/or in collaboration with other investors. We employ several ways of doing this: voting at shareholder meetings, shareholder proposals or direct company engagement by expressing our views, in writing or through dialogue with the company's management, advisers or Board of directors.

We believe combining engagement with companies and voting is a good strategy for achieving change in corporate behaviour, and thus for reducing adverse impact. Both methods can effectively address ESG concerns and provide complementary signals to companies on where we stand on important issues.

Our stewardship approach is strategically aligned with the interests of our clients and our policies. To that end, our engagement themes and processes are long term in nature, with pre-determined focus areas for multiyear periods of time. We believe this aligns well with the expectations and interests of institutional asset owners, many of whom have a long-term investment horizon. Further our Sustainable Investment Policy and underlying policies apply regardless of the instrument or asset class.

#### Whole-portfolio approach to stewardship

A differentiating feature of Storebrand AM's investment approach, and an important method for ensuring we can meet our business sustainability commitments, is the fact that all our funds under management are subject to baseline sustainability criteria. When it comes to the implementation of strategies to meet our sustainability targets it is crucial that we can engage, and divest, on behalf of the whole Storebrand AM portfolio. This work is done by the Storebrand AM Risk and Ownership team in line with our policies.

The Risk and Ownership team sets Storebrand AM's priority engagement themes and develops frameworks and strategies to engage portfolio companies on those themes, including direct and collaborative engagements both internally (with portfolio managers) and externally (with industry coalitions). This whole-portfolio approach is also helpful for engaging in systemic sustainability issues and policy engagements.

#### Engagement prioritization

Most of our engagement is based on prioritization of salient themes as well as other factors, including our assessment of the significance of a particular matter, holding size, scope to effect change, and opportunities to collaborate with other investors. In a few cases, usually less than 10%

of our total number of engagements, we engage companies in reaction to company incidents or controversies. This weighting of our efforts is based on our engagement strategy which emphasizes a positive impact on systemic risks (proactive engagement) in addition to redressing wrongs (reactive engagement). Therefore, we prioritize engagements where we think we can have a better opportunity to obtain results and positive impact in alignment with our policies. This means better quality engagements for longer periods of time and when possible, with other investors for more leverage. It also allows for more proactive engagement.

### Engagement themes

To maximize our impact, and based on a structured assessment, we periodically develop engagement themes that guide and focus our action. Storebrand AM has prioritised three thematic engagement themes and two cross cutting themes for the 2024-2026 period. Our prioritised themes align with the Sustainable Development Goals and with our own corporate commitments, as outlined in our Sustainable Investment Policy. Our engagement priorities are characterised by a focus on double materiality, addressing salient issues that have implications for the financial value of companies, as well as the companies' impact on the world at large. Strategically, we have also focused on issues where we have significant in-house expertise and experience, and where we believe we are well-placed to influence companies in a positive direction.

Our engagement themes for 2024-2026 are<sup>13</sup>:

- Climate change, which accounted for 37.8% of our engagements in 2025
- Nature and biodiversity, which accounted for 25.3% of our engagements in 2025
- Human rights, which accounted for 35.4% of our engagements in 2025

Our cross-cutting themes for 2024-2026, which are elements in all our dialogues on the main engagement themes, are:

- Policy dialogue
- Sustainability disclosure

See Principle 3 below for a description of engagement activities and outcomes for our priority engagement themes.

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<sup>13</sup> Voting and engagement numbers for 2025 cover Storebrand-branded funds only, including Delphi. While SKAGEN was fully incorporated into Storebrand AM in 2025, databases on engagement and voting are not yet integrated.

**Explain if, and how, this has differed across investment styles, asset classes or geographies**

Storebrand Asset Management integrates stewardship and investment decision-making to support long-term, sustainable value creation for clients and beneficiaries. Stewardship is treated as a core investment responsibility rather than a parallel or stand-alone activity, reflecting our role as a long-term asset manager and the investment horizons of our clients. We believe that well-governed companies that effectively manage environmental and social risks are better positioned to deliver resilient financial returns over time. This integration is embedded through close and structured collaboration between portfolio managers and our dedicated Risk and Ownership team, ensuring that stewardship insights systematically inform investment decisions and that investment analysis shapes stewardship priorities. This collaboration is further supported by our Portfolio Manager ESG Integration Forum, established to provide a structured setting for regular dialogue, follow-up on engagement cases and effective integration of sustainability analysis into portfolio management.

Across investment styles, stewardship is implemented in a manner that reflects the level of discretion and influence inherent in each strategy, while remaining anchored in a common, firm-wide framework. For actively managed strategies, portfolio managers work closely with the Risk and Ownership team to identify and assess material sustainability risks and opportunities at the company level. Engagement priorities, escalation decisions and voting considerations are informed by fundamental investment analysis, company-specific context and long-term value drivers. For systematic and index-oriented strategies, stewardship is led centrally by the Risk and Ownership team, with a focus on market-wide risks, thematic engagements and consistent voting practices. This approach ensures that stewardship is applied across all assets under management, while appropriately reflecting differences in investment style and decision-making authority.

Stewardship integration is applied consistently across asset classes, but calibrated to reflect differences in instruments, data availability and influence mechanisms. In listed equities, stewardship is primarily exercised through direct company engagement, proxy voting and escalation where necessary. In fixed income, stewardship focuses on issuer-level analysis, dialogue with issuers and underwriters, and the integration of sustainability considerations into credit assessments and relative value analysis. While the tools and channels may differ, the underlying objective remains the same: to identify, assess and manage sustainability-related risks and opportunities that may affect long-term risk-adjusted returns.

Geographically, Storebrand Asset Management applies a globally consistent stewardship framework, underpinned by international norms and standards such as the UN Global Compact and OECD Guidelines. At the same time, engagement strategies and prioritisation are adapted to local market contexts, regulatory environments and ownership structures. This ensures that stewardship activities remain relevant and effective across regions, while maintaining a coherent and transparent approach for clients and beneficiaries regardless of where assets are invested.

Storebrand Asset Management's strong Nordic position further enhances the effective integration of stewardship and investment, in line with the UK Stewardship Code's emphasis on outcomes and

long-term value creation. As a leading asset manager in the Nordic region, we often hold meaningful ownership positions and benefit from well-established access to companies, enabling informed, constructive and ongoing dialogue on issues that are financially material to long-term performance. This local presence and influence strengthen the effectiveness of our stewardship activities and allow insights from engagement and voting to be systematically incorporated into investment analysis and decision-making. While our stewardship framework and expectations are applied consistently across all markets, we prioritise engagement where our resources, influence and knowledge are most likely to drive change, reflecting a disciplined, investment-led approach to stewardship that supports sustainable outcomes for clients and beneficiaries.

### **Provide examples that show how you have integrated stewardship activities and investment processes**

Racing to Net-Zero – Portfolio-Level Climate Integration. One of the clearest examples of stewardship fully integrated with investment process is Storebrand AM's approach to net-zero alignment in portfolio construction. Our quantitative investment strategies incorporate carbon intensity and forward-looking climate transition metrics directly into portfolio construction algorithms. This means that our stewardship objectives – specifically, the ambition to manage a portfolio aligned with a 1.5°C scenario – are hardwired into the investment process, not imposed as an afterthought. Portfolio managers in our systematic strategies work alongside the Risk and Ownership team to ensure that engagement signals (for example, a company's responsiveness to our climate engagement or its progress against TCFD disclosure targets) are available as inputs to ongoing portfolio monitoring. Where a company demonstrates sustained failure to engage or progress, this is flagged to the portfolio management team and can inform a review of the position.

ESG Integration in Credit Analysis. In our fixed income strategies, portfolio managers integrate sustainability analysis as a formal component of credit evaluation. Our fixed income team has developed an internal framework for evaluating the ESG-adjusted credit risk of bond issuers, considering factors such as climate transition exposure, social licence to operate, and governance quality alongside conventional credit metrics. In the primary market, we participate in new green bond issuances and use the terms of our participation to signal expectations – for example, by communicating our assessment of a company's sustainability-linked bond framework and indicating whether the key performance indicators and targets we regard as credible. This represents stewardship exercised at the point of investment, not only post-acquisition.

Bloomberg Integration Tool. To support portfolio managers across all asset classes and strategies in integrating stewardship considerations, the Risk and Ownership team developed a dedicated Bloomberg-based tool that consolidates all issuer-specific sustainability information in a single accessible interface. This tool brings together engagement status, ESG scores, controversy alerts, exclusion list status, and climate data, enabling portfolio managers to see the full stewardship picture for any given issuer at a glance. In 2025, use of this tool expanded to additional portfolio management teams, and further development work is underway to deepen its analytical capabilities.

## 2. Signatories identify and respond to market-wide and systemic risks to promote well-functioning financial markets

**Describe the key market-wide and systemic risks and opportunities you have identified and how they relate to your investments**

Storebrand AM promotes a well-functioning financial system as a global investor by addressing risks through a mature internal risk management framework and healthy external collaborations. It is in the best interests of all market participants to have a level playing field in place, where no single entity benefits at the cost of other participants. Storebrand AM is an active contributor protecting the integrity and sustainability of the financial markets for our investors, clients, counterparties, and other stakeholders' long-term interests.

As a prominent Nordic investor in global financial markets, representing universal asset owners in many countries, we have the opportunity to contribute to a well-functioning financial system through responsible investment practices. In this section we will describe:

1. How we use Enterprise Risk Management to identify and manage all risks, and promote a well-functioning financial system.
2. How we respond to market-wide and systemic risks and promote a well-functioning financial system through our responsible investment strategy and stewardship approach.

### Enterprise Risk Management

Our risk management framework is designed to take the appropriate risks to deliver returns to customers and owners. At the same time, the framework will ensure that we protect our customers, owners, employees and other stakeholders from unwanted incidents and losses. The framework covers all risks to which Storebrand may be exposed. Regulatory changes continue to pose enterprise risk for financial services firms, new and forthcoming regulatory changes, both international and domestic, are discussed at length in the Storebrand ASA annual report for 2025 (page 25)<sup>14</sup>. The risks pertinent to Storebrand AM in this regard for the 2025 reporting period are as follows in relation to EU Action plan on sustainable finance:

- Omnibus I:  
In 2025, the European Commission proposed several initiatives to reduce administrative burdens in EU legislation and strengthen the EU's competitiveness. Omnibus I was the first initiative and included simplifications within sustainability reporting (CSRD), due diligence (CSDDD) and the EU Taxonomy. The Omnibus I

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<sup>14</sup> [2025-annual-report-storebrand-asa.pdf](#)

Directive was adopted by the European Parliament on 16 December 2025. Throughout 2025, Storebrand provided input to the EU process, including through Finance Norway. Storebrand has emphasised the importance of achieving meaningful simplifications and better alignment between the regulatory frameworks, while ensuring that ambitions for ESG are not weakened.

- EU Taxonomy:

In 2025, the European Commission adopted simplifications through Omnibus I, which apply in the EU from the 2025 financial year. The Norwegian Ministry of Finance has confirmed that Norwegian entities may apply these simplifications for the 2025 financial year. In the section "EU Taxonomy", Storebrand reports on the Group's activities and exposures.

- Corporate Sustainability Reporting Directive (CSRD):

In 2025, CSRD and the accompanying ESRS standards were revised through Omnibus I. The final legislative text is expected to be published in 2026. In Norway, a public consultation is expected before national implementation, which will likely enter into force in 2026. The revised ESRS standards entail fewer data points and several structural simplifications intended to make the framework more user friendly and reporting easier. The central principle of double materiality remains in place, and requirements for reporting on climate transition plans are maintained. The number of companies required to report is expected to fall by approximately 90% due to raised thresholds. As an investor, this may create challenges for Storebrand in terms of access to information from the value chain, and because the simplifications are not fully aligned with requirements in other regulatory frameworks.

Overall risks, including climate risk, are described in a risk analysis report addressed by Storebrand AM Group Management and the Board twice a year. The risk analysis includes assessments of business and reputation risks related to the Storebrand Group's strategy to uphold a leading sustainability position. Climate risk also is addressed in the annual ORSA-report, which is sent to Norway's Financial Supervisory Authority following approval by the Storebrand Board.

Storebrand Asset Management uses climate scenario analysis and stress testing to identify financial risks in its portfolios and guide alignment with the Paris Agreement's goal of limiting global warming to 1,5 degree. Storebrand primarily utilizes the Network for Greening the Financial System (NGFS) framework to assess how different future scenarios impact investment values:

Controlled Transition (1,5 degrees): Swift climate policy action leads to net-zero emissions by 2050. This focuses on "transition risk," where high-carbon assets may lose value quickly due to new regulations or carbon pricing.

Delayed Transition (2 degrees): Divergent policies and delayed action lead to a sudden, "disorderly" shift after 2025, increasing the costs of austerity and market shocks.

Warm World (3 degrees): Failure to meet Paris goals results in severe "physical risk," where extreme weather events (floods, storms) directly damage company assets and supply chains.

Our risk management processes ensure cost-effective operations, reliable reporting, and compliance with internal and external regulations. Based on our strategic plans, Storebrand AM works systematically to identify risks and implement necessary risk-reducing actions to ensure that our objectives are achieved. A governance and control structure has been established for all management processes in the Storebrand Group companies and covers all processes from the signing of client agreements to the execution of the individual trades in the portfolios and funds. Each Portfolio Manager in Storebrand AM has mandates assigned to them by the Chief Investment Officers to ensure that the responsibility is as clear as possible and with solid segregation of duties between Portfolio Managers and between the different Front Office teams. A structured and solid control environment is based on culture, awareness, company values, and integrity. Storebrand AM's principles governing internal controls and the administration of activities are intended to support internal governance. This is reflected in the clear segregation of duties between teams, sections, and departments.

#### Principle risk categories

Storebrand AM has identified the following principal risk categories relevant to our business and our participation in financial markets:

1. Business risk – Unexpected changes in terms and conditions for operating the business, such as social conditions and economic fluctuations. Business risk includes strategic risk, reputational risk and other unexpected changes due to external conditions.
2. Financial risk - Risk of changes due to financial market fluctuations or volatility beyond expectations.
3. Liquidity risk – Risk of not being able to meet payment obligations in a timely manner.
4. Operational risk - Risk of financial loss, reputational damages or sanctions related to breaches of internal or external regulations as a result of ineffective, inadequate or failing internal processes or systems, human error, external events or non-compliance with rules and guidelines.
5. Compliance risk - The risk of incurring public sanctions, financial loss, compensation claims and/or loss of reputation due to non-compliance with external and internal regulations.

Many of these risk categories include a wide variety of subcategories, but all of them are relevant to Storebrand AM's clients, counterparties and other stakeholders and must be addressed to ensure Storebrand AM is a robust and resilient service provider and market participant.

Enterprise Risk Management offers Storebrand AM processes and controls to manage and positively influence these systemic risks at the entity level, which is important and significant given Storebrand AM's influence within the Nordic financial system.

For example, we are vocal proponents of sustainability reporting regulations, such as the Corporate Sustainability Reporting Directive (CSRD) and Sustainable Finance Disclosure Regulation (SFDR),

and we are committed to improving the environment for enhanced corporate disclosures through initiatives such as the Task Force on Climate-related Financial Disclosures (TCFD) and the Taskforce for Nature Related Financial Disclosures (TNFD). These actions are key to managing business, operational and compliance risks going forward. Further, as we have highlighted in Section A "Purpose and Vision", long term environmental and social sustainability principles are deeply embedded in our beliefs, business strategy and investment process. This is because they are financial risks which we must manage in order to achieve the best possible risk adjusted returns for our clients. Our method for managing these risks is further described below.

### Managing Risks through our Responsible Investment Strategy and Stewardship Approach

Storebrand AM selects issuer engagement themes that reflect systemic, market-wide risks, cross-sector, cross-asset-class and cross-border risks that cannot be solved through engagement with individual companies alone. As a diversified, long-term investor for universal asset owners, our returns depend on stable economic, environmental and social systems. Risk identification is supported by our enterprise risk management framework.

We treat climate change as systemic due to widespread physical and transition risks, compounded by corporate lobbying that weakens science-based policy. Deforestation and nature loss are systemic because degraded ecosystem services threaten agriculture, supply chains, food security and sovereign stability. Human rights risks in conflict-affected and high-risk areas (CAHRA) are systemic as escalating conflict increases exposure to violations across sectors including technology, defence and infrastructure. Living wages are market-wide because sub-standard labour practices create regulatory, reputational and operational risks across industries. Ethical AI governance is an emerging systemic theme given rapid cross-sector deployment and the potential for widespread harm where safeguards are weak.

As a prominent Nordic asset manager Storebrand AM has the opportunity to influence companies and policy makers towards more sustainable development, thus addressing systemic risks and contributing to a well-functioning global financial system. As detailed in Section A "Investment beliefs or stewardship strategy", we take a four-pronged approach to sustainable investing, encompassing:

1. Solutions-driven investment
2. Active ownership
3. Exclusion
4. Portfolio integration

Storebrand's Sustainable Investment Policy<sup>15</sup>, Engagement and Voting Policy<sup>16</sup> and Exclusion Policy<sup>17</sup> incorporate our guiding principles and methods for stewardship as well as for exclusion of companies in our investment universe. Our policies and standards are aligned with the PRI. Here we will discuss how Storebrand AM addresses the systemic issues of climate change, nature degradation and human rights and contributes to a well-functioning global financial system by using our position as a prominent Nordic asset manager to influence companies and policy makers towards more sustainable development. We achieve this through 1) collaboration and policy-based initiatives and 2) integrating sustainability into our asset management processes:

**Explain how you have contributed to relevant market-wide policy or standard setting initiatives, or engaged with policy makers, standard setters, regulators or other relevant stakeholders as aligned with your stewardship approach.**

Storebrand Asset Management contributes to market-wide policy and standard setting through a proactive stewardship approach that combines direct policy dialogue, strategic leadership in global alliances, and advocacy for systemic regulatory changes.

#### Direct Policy & Regulatory Engagement

Storebrand AM engages with policymakers to create framework conditions that favour sustainable long-term value creation:

- Carbon Pricing Advocacy: Storebrand AM actively advocates for increased taxes on carbon emissions to incentivize the green transition.
- Economic Incentives for Nature: The firm advocates for policies that incorporate nature into financial decision-making, such as aligning economic incentives with sustainable practices.

#### Leadership in Standard-Setting Initiatives

Storebrand AM acts as a pioneer and "early adopter" to establish new market standards for transparency and risk management:

- TNFD Early Adopter: In January 2024, Storebrand AM became an inaugural "Early Adopter" of the Taskforce on Nature-related Financial Disclosures (TNFD), helping to set the global standard for reporting nature-related risks.
- Net-Zero Asset Manager Initiative (NZAM): As a member of the NZAM, Storebrand AM helps define the methodologies for transitioning investment portfolios to net-zero by 2050.

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<sup>15</sup> [sustainable-investment-policy\\_2026.pdf](#)

<sup>16</sup> [engagement-and-voting-policy\\_2026.pdf](#)

<sup>17</sup> [exclusion-policy\\_2026.pdf](#)

- Science-Based Targets (SBTi): Storebrand has set validated science-based targets and proactively encourages its investee companies to do the same, aiming for 42% of its listed equity portfolio to have SBTi-validated targets by 2027.

### Collaborative Advocacy & Global Platforms

Storebrand AM leverages investor coalitions to amplify its influence on global policy:

- Nature & Biodiversity: Storebrand AM participates in alliances like Finance for Biodiversity and Investor Policy Dialogue on Deforestation (IPDD), engaging with governments and other policy-makers to promote sustainable business practices at the state level.
- Climate Action 100+: Uses this platform to connect with like-minded investors and coordinate pressure on the world's largest emitters to support the Paris Agreement goals.
- Human Rights Alliances: Participates in the Investor Alliance for Human Rights and PRI Advance to drive standards for "just transition" and human rights due diligence in priority business sectors.

### Expectations for responsible policy engagement by investee companies

- Storebrand AM extends its stewardship by requiring that the companies it invests in also align their own political engagement with global standards:
- Lobbying Transparency: Storebrand AM expects investee companies to disclose their climate policy engagement and ensure that any lobbying, directly or via trade associations, is aligned with the Paris Agreement and the Kunming/Montreal Global Biodiversity Framework (GBF).
- Divestment for Obstruction: Storebrand AM maintains a policy to divest from companies that "deliberately and systematically work against" the Paris Agreement and/or Kunming Montreal agreement through their political activities.

Where we take part in collaborative initiatives we play an active role, leading on company dialogues, particularly in the Nordics where we have a strong corporate brand and a home advantage.

During 2025 we have continued our focus on policy level dialogues, collaborating with other asset managers and NGOs. We have addressed issues such as: due diligence regulations (CSDDD, EUDR, Norway's Transparency Act); reporting (CSRD, TNFD, TCFD); and nature risk.

Examples of collaborative and policy-based initiatives to address systemic sustainability issues:

1. Deforestation: Storebrand AM established (in 2020) and continues to co-chair the collaborative engagement initiative titled the Investor Policy Dialogue on Deforestation (IPDD). Through IPDD we engage with policy makers in selected countries such as Brazil, Indonesia and consumer countries (EU, UK and China) to promote sustainable land use and forest management and respect for human rights, with an initial focus on tropical forests and natural vegetation.

During 2025, Storebrand AM signed letters from investor coalitions IIGCC and IPDD to the European Commission and EU member state governments, expressing support for the EU Deforestation Regulation and cautioning against further delays or weakening of the regulation. Storebrand AM also represented the IPDD in meetings with the European Commission's Environment Cabinet, emphasizing how any further delays or simplification of the EUDR creates financial risks for investors. Unfortunately, the EU decided to postpone implementation of the EUDR until Jan 1<sup>st</sup> 2027, to provide more time for companies to prepare. While Storebrand AM was disappointed with the delay, we will continue to urge EU policymakers to ensure that this period is used to improve traceability, implementation and compliance regimes. Storebrand considers the EUDR to be a landmark in driving traceability of commodity supply chains, which is needed for companies and financial institutions to address financial, reputational, operational, legal and regulatory risks arising from deforestation.

In the run-up to COP30, Storebrand was among the first signatories of the Belém Investor Statement – backed by 51 institutional investors representing USD 4.5 trillion in assets – calling on governments to promote deforestation-free trade, strengthen disclosure requirements, enforce forest protection laws, and align public finance with nature goals.

2. Nature: Storebrand AM plays a leadership role in the Public Policy Advocacy workstream of the Finance for Biodiversity (FfB) Foundation, which it co-chairs. As a co-chair, it coordinates a group of over 200 financial institutions to engage directly with global policy-makers. The role involves:
  - Negotiations and representation: representing the private financial sector at major UN summits including COP 15 in Montreal and COP 16 in Cali
  - Developing Policy Recommendations: Co-authoring guidance for governments on how to align national biodiversity strategies with financial flows
  - Advocacy for mandatory disclosure\_ Leading the call for governments to require large companies and financial institutions to regularly disclose their nature-related risks and impacts.
    - Storebrand's advocacy, through the FfB Foundation, contributed to several landmark outcomes in global biodiversity policy:

- i. Inclusion of Private Finance in the GBF: The resulting Kunming-Montreal Global Biodiversity Framework (GBF) explicitly recognized the role of private finance in Goal D and Targets 14 and 19.
- ii. Adoption of Target 15: Storebrand successfully advocated for Target 15 of the GBF, which urges governments to ensure that large and transnational companies disclose their impacts and dependencies on nature.
- iii. Alignment of Financial Flows: Their work helped establish the principle that all financial flows – both public and private – must be aligned with the goals of the GBF to successfully halt nature loss.

### 3. EU Sustainability regulations:

In June 2025, Storebrand signed a Eurosif-organised joint investor and company statement written to Members of the European Parliament amid proposed changes to the CSRD, ESRS, and CSDDD. The letter emphasised that these regulations provide a key foundation for the EU's economic and sustainability goals. Specific asks included:

- Simplifying ESRS while maintaining double materiality and interoperability with ISSB, GRI and TNFD
- Keeping companies with 500+ employees in scope of CSRD (in line with the NFRD)
- Ensuring the value chain cap still allows sustainability data exchange between investors and companies
- Safeguarding the core of the CSDDD, including risk-based due diligence aligned with UN Guiding Principles and OECD Guidelines
- Maintaining the CSDDD requirement for companies to adopt climate transition plans with science-based targets disclosed under CSRD

In early October 2025, Storebrand was again part of a group of investors publishing a joint statement in the context of the Omnibus I simplification initiative, calling on legislators to preserve the core elements of the CSRD (underpinned by ESRS) and the CSDDD. The statement argued that these rules are essential for the EU's sustainability and competitiveness ambitions and that simplification can be achieved without compromising their substance.

#### Contributing to a well-functioning asset management industry

Storebrand AM has for many years been a vital asset manager in the Norwegian fund industry and an influential member of the Norwegian Fund and Asset Management Association ("VFF"). The VFF is a forum for asset managers to discuss industry matters and establish industry standards.

Through various working groups, such as but not limited to Compliance, Risk Management, Fixed Income, ESG etc., the members may raise issues experienced in their own processes and the need for clarification – both through discussions and through documented industry standards. The

working groups prepare and suggest any new or changing industry standards. Along with supporting resources from the VFF, these working groups consist of industry experts in specific fields and Storebrand AM has representatives in all established groups.

As a member of the VFF, Storebrand AM must report compliance with specific industry standards on an annual basis. This ensures a robust setup of standards that is respected in the industry and contributes to a reliable environment for conducting business. Another important association for the finance industry in Norway is Finance Norway. They advocate the views of the industry towards different groups in Norwegian society; politicians, government, consumer authorities, international collaborators and decision-makers and consumers. Storebrand AM is always striving to contribute to efforts that support the industry in our clients' best interest.

Storebrand AM staff regularly serve on the boards of the national Sustainable Investment Forums (SIFs) in the Nordics. The SIFs are important investment sector forums aimed at promoting sustainable investment practices, disseminating information, and engaging the community. Since 2024 we have also been member of the UKSIF.

#### Management of market-wide and systemic risks through the way that we invest our clients' assets:

We believe that certain unsustainable business practices and products should be avoided by responsible investors, particularly where engagement cannot or has not been successful thereby resulting in known but unmanaged portfolio risk exposures. Exclusions are therefore one way that Storebrand manages market-wide and systemic risks to investments that are difficult for us to influence through stewardship. Storebrand will in most cases first use its position as an investor to engage companies in dialogue and seek to make adequate improvements to end breaches. If dialogue and further escalation measures do not lead to positive changes, a company may be excluded from investment. Exclusion is thus a final method for escalation and we publish our exclusions, aiming for impact through transparency. Exclusion of companies that breach global norms or whose business is based on products or activities that create systemic risks for our wider investment portfolios, is also a way of exercising our fiduciary duty. See Section A "Investment beliefs or stewardship strategy" for a detailed description of our exclusion policy and practices, and Principle 3 for "Exclusion summary for 2025".

In addition to our efforts to set a clear policy and standard for engagement and exclusion of companies Storebrand AM also integrates sustainability risk ratings into investment decisions to avoid, or reduce investments in, companies that offer high sustainability risks and prioritise investment in companies with low sustainability risk.

The Storebrand Sustainability Score (described in Section A "Investment beliefs or stewardship strategy") is assigned to all listed companies we invest in and is available for our portfolio managers to integrate in investment decisions. The idea is to move capital away from high sustainability risk companies to companies with lower sustainability risk.

### Principle Adverse Impacts (PAIs)

Since 2021, we have integrated the Principal Adverse Impacts (PAIs) identified in the EU Sustainable Finance Disclosure Regulation (SFDR) into our risk analysis for asset classes where data is available. There is an overlap between PAI indicators, and our general work carried out to mitigate risk. This has not changed our methodology to identify risk, but has added a new dimension to further map, manage, measure and mitigate adverse impact as more specific data is available. More information regarding PAIs and our due diligence work addressing them can be found in our Principal Adverse Impact Statement available on our website.

### **Explain how you have engaged with issuers on these risks, as applicable**

Storebrand AM prioritises proactive engagements related to systemic and market-wide risks, aiming to drive positive change across priority sectors of the economy. As described under Principle 1, our priority engagement themes are climate change, nature and human rights.

See Principle 3 for a description of activities and outcomes of engagements in 2025. During 2025, examples included:

- Nippon Steel and JFE Holdings: Engaged on climate transition to seek improved disclosure of climate lobbying, targets and transition planning.
- Amazon.com: Engaged on labour rights with a focus on working conditions and freedom of association
- Tesla: Escalated engagement through co-filing a shareholder resolution on labour rights and sending a joint investor letter to the Board to seek governance reforms.
- Inditex: Engaged on labour standards in the Cambodian supply chain, seeking improvements in responsible sourcing and supplier practices.
- Swedish forestry companies: Engaged on nature and biodiversity, seeking alignment with recognised forest certification standards, including FSC, to support credible forest management practices.
- Bunge Global and Archer Daniels Midland: Engaged on deforestation risk in commodity supply chains. Bunge was removed from our observation list following acceptable progress; ADM remained under ongoing engagement. Both companies were escalated to Observation list status in 2021.
- Toyota Motor Corp: Escalated long-term engagement on climate lobbying by excluding the company in Q2 2025.

We supplement dialogue with on-site due diligence where it can improve our understanding of how policies and commitments are implemented in practice. In 2025, we conducted site visits to Helios Towers PLC in Africa and to UPM and Stora Enso in Finland to assess relevant environmental and social practices, including forest management and stakeholder impacts.

We also collaborate with other investors and stakeholders where risks are systemic, where collective action increases leverage, or where market- or policy-level change is needed. We assess collaborative initiatives for strategic fit, governance, and expected effectiveness, and we contribute where we believe participation can support real-world outcomes. Key collaborative activities during 2025 included:

- **Investor Alliance for Human Rights: CAHRA Project:** Contributed to an 18-month collaboration that produced an investor guide on managing exposure to conflict-affected and high-risk areas (CAHRA). Continued into phase two by engaging companies to strengthen human rights due diligence in higher-risk contexts.
- **Investor Working Group on Defence Tech & Responsible Investment:** Joined a working group convened by the Investor Alliance for Human Rights, the Business and Human Rights Resource Centre and the Heartland Initiative to develop investor practice on responsible stewardship in the defence technology sector.
- **Joint investor letter on living wages:** Supported a joint investor call to UN member states for coordinated action to advance living wages.
- **Platform Living Wage Financials (PLWF):** Participated in investor engagement on the payment of living wages across supply chains; the PLWF report was published in Q4 2025.
- **Investor Policy Dialogue on Deforestation (IPDD):** As co-chair of the Brazil working group, contributed to policy dialogue to address deforestation-related financial risk. Activities included meetings with Brazil's Ministry of Environment, Central Bank and Treasury, among other government entities.
- **Belém Investor Statement on Rainforests:** Was an early signatory to a collective statement supported by 51 institutional investors representing USD 4.5 trillion, calling for stronger government action on forest protection and alignment with global nature goals.
- **Nature Action 100 (NA100):** As a founding partner and steering group committee member, undertook structured engagement with companies in high-impact sectors. In Q4 2025, participated in investor site visits to UPM and Stora Enso in Finland to support sector dialogue on forestry challenges.
- **European Biodiversity and Business nature summit (EBNS) 2025:** Storebrand AM CEO attended the EBNS in Helsinki in Finland in 2025, in a speaking role to explain Storebrand's approach to nature-related risks and opportunities. Storebrand AM is part of the advisory board of EU Biodiversity and Business.
- **PRI Collaboration Platform SPRING and IIGCC Deforestation Investor Group:** Contributed to additional investor platforms to support collective engagement on biodiversity and deforestation risk.
- **Ethical AI engagement:** Published an Ethical AI Progress Report setting out engagement activity and outcomes with technology companies on responsible AI, including risks related to military applications, surveillance and dual-use technologies.

**Where you have done so, explain how and why you have escalated your stewardship activity regarding market-wide or systemic risks, and any progress made.**

Where bilateral engagement is insufficient, we escalate through collaboration, policy advocacy, voting and, as a last resort, exclusion. In 2025, this included excluding Toyota for climate lobbying misaligned with the Paris Agreement; portfolio-wide CAHRA screening leading to 26 company exclusions (including Caterpillar); and escalating from company dialogue to co-chairing the IPDD and publicly advocating on the EU Deforestation Regulation. Case narratives are provided in Principle 3.

### 3. Signatories engage to maintain or enhance the value of assets

#### Explain how you have selected and prioritised the issues on which you have engaged

Storebrand AM selects and prioritizes engagement issues using a structured framework based on double materiality, geographic leverage, and thematic focus. Storebrand AM considers four primary factors when deciding whether to engage with a specific company or policy matter:

- **Significance of the Matter:** The focus is on "salient issues" that have significant implications for both the financial value of the company and its impact on the world. To a large extent, the priority engagement themes are systemic risks that affect the economy as a whole. See Principle 1 for a description of selection and prioritisation of priority themes for engagement
- **Holding Size & Ownership:** Prioritization is given to companies where Storebrand AM's ownership level is highest, as this provides greater leverage for targeted individual engagement.
- **Scope to Effect Change:** They assess where they have significant in-house expertise and where they believe they are well-placed to influence positive direction.
- **Geographic Leverage:** As a Nordic actor, Storebrand AM prioritizes proactive engagement with Nordic companies where their brand and local knowledge enable more constructive dialogue.

As described under Principle 1, our priority engagement themes for 2024-2026 are:

- Climate change
- Nature and biodiversity
- Human rights

Our cross-cutting themes for 2024-2026, which are elements in all our dialogues on the main engagement themes, are:

- Policy dialogue
- Sustainability disclosure

#### Explain the purpose of your engagements

The purpose of Storebrand Asset Management's engagement is to fulfil our fiduciary duty by ensuring that companies manage risks and opportunities in a way that protects long-term shareholder value.

##### 1. Risk Management and Value Protection/Creation

The primary goal is to mitigate financial risks. By engaging with companies on ESG issues (Environmental, Social, and Governance), Storebrand AM aims to prevent losses stemming from regulatory fines, stranded assets (like coal reserves), reputational damage, or physical

climate impacts. They believe that companies with sustainable business models are more resilient and profitable over time.

## 2. Driving Real-World Impact

Storebrand AM uses its influence as a shareholder to push for tangible changes that align with global goals or international norms related to environmental, social or governance issues. The goal is to move companies from:

- Awareness: Getting the company to acknowledge an ESG-related issue.
- Commitment: Encouraging the company to address material ESG issues through credible action or transition plans, including verifiable targets.
- Implementation: Verifying that the company implements positive changes in accordance with its targets, policies and plans.

## 3. Systemic Influence/Policy Engagement

Storebrand AM engages not just with companies, but with regulators and policymakers. The purpose is to advocate for "a level playing field that address systemic risks across the economy" By pushing for mandatory climate and nature disclosures and human rights due diligence Storebrand AM aims to prevent sustainable companies from being placed at a competitive disadvantage and that the entire financial system moves toward stability.

## 4. Accountability and Stewardship

Engagement provides a mechanism for holding boards and management teams accountable. If a company fails to respond to dialogue or violates Storebrand's minimum sustainability standards, the engagement can be escalated through various means and can as a last resort end in exclusion of the company, company's risk profile becomes unacceptable.

Our approach is grounded in the principles and guidelines set out in Storebrand Asset Management's Sustainable Investment Policy.

A key differentiating feature of Storebrand Asset Management's investment approach is the application of baseline sustainability criteria across all funds under management. To meet our sustainability targets, it is essential that we are able to engage with, or divest from, companies on behalf of the entire portfolio. This whole-portfolio approach also supports engagement on systemic sustainability challenges and policy-level issues.

### **Describe your methods of engagement, including whether you have engaged bilaterally or in collaboration with others, and the reasons for your chosen method**

The Risk and Ownership team defines priority engagement themes and develops engagement frameworks and strategies for portfolio companies. Engagements are conducted both bilaterally and collaboratively, internally in close cooperation with portfolio managers and externally through industry coalitions.

We prioritise engagements where we believe there is the greatest opportunity to achieve meaningful results in line with our policies. This approach enables higher-quality engagements over longer time horizons.

Before initiating engagements, we establish clear objectives to support transparent communication with companies and to enable the measurement of progress. Engagements are classified as reactive, responding to controversies or potential breaches of standards, or proactive, addressing systemic issues at company or sector level.

Progress is measured across four levels, aligned with the UN Principles for Responsible Investment definition of success. These range from initial contact without response to demonstrable improvements in business practices. Engagement outcomes are subsequently classified as successful, unsuccessful, neutral, or having no observable outcome. While success is often easier to determine in reactive engagements, progress in proactive engagements, such as those related to climate, is reviewed regularly to assess effectiveness and determine whether escalation is required.

Engagement with companies takes place at multiple levels, including both management and board level, and may be conducted directly or in collaboration with other investors. We engage through several channels, including voting at shareholder meetings, submitting or supporting shareholder proposals, and direct dialogue with company representatives. This dialogue may take place in writing or through meetings with management, advisers, or Boards of Directors.

We believe that combining engagement with voting is an effective strategy for influencing corporate behaviour and reducing adverse impacts. Both tools can address environmental, social, and governance (ESG) concerns and provide complementary signals to companies regarding our expectations on material sustainability issues.

Voting is an integral part of our active ownership approach and reflects our commitment to sustainable, long-term value creation. Voting rights are exercised solely in the common interest of unitholders, with the objective of achieving the best possible risk-adjusted returns while promoting sound corporate governance and strong ESG practices. Responsibility for voting is delegated to the Risk and Ownership team, in close cooperation with relevant portfolio managers. All voting decisions are published on our website five days ahead of shareholder annual general meetings.

Storebrand AM employs both bilateral and collaborative engagement methods, selected based on the significance of the matter, the size of holdings, the scope to effect change, and the opportunities to collaborate with other investors, as set out in Storebrand AM's Sustainable Investment Policy. The Policy states that engagement "can be both direct individually and/or in collaboration with other investors" and that combining these approaches "can reinforce each other and be an effective signal to companies regarding our views on important ESG issues." The firm prioritises engagements where it believes it can achieve "better quality engagements for longer periods of time and when possible, with other investors for more leverage."

Bilateral engagement is undertaken where company-specific issues require tailored dialogue; during 2025, Storebrand were involved in 145 direct, bilateral engagements. The firm's general principle, as stated in the Q3 2025 Sustainable Investment Review, is that "exclusion is not the objective when companies come under our scrutiny. Ideally, we want a constructive dialogue with the companies, leading to a change in their actions, so that we can thus continue to be invested."

Where issues are systemic in nature and require collective investor influence or policy-level engagement, Storebrand engages collaboratively through investor coalitions and multi-stakeholder initiatives. In 2025, we participated actively in 142 collaborative engagement dialogues, in addition to supporting 682 company engagements as signatory only, meaning that we are members of a collaborative initiative but do not participate in the company-specific dialogues. Collaborative platforms that we engaged through during 2025 included the Investor Alliance for Human Rights CAHRA project, which produced practical guidance for investors on managing exposure to conflict-affected areas and entered a second phase focused on company engagement; a newly formed Investor Working Group on Defence Tech and Responsible Investment; the Investor Policy Dialogue on Deforestation, of which Storebrand serves as co-chair of the Brazil working group; Finance Sector Deforestation Action (FSDA), Nature Action 100, of which Storebrand is a founding partner; the Finance for Biodiversity Coalition, where Storebrand chairs the Public Policy Advocacy working group; and the Platform Living Wage Financials coalition. These collaborative platforms are chosen because they enable engagement not only with companies but also with policymakers and governments on systemic risks, such as deforestation, biodiversity loss, human rights in conflict zones, and living wages, which is beyond the reach of bilateral dialogue alone.

### **Provide examples of your engagement, with an explanation of progress towards identified objectives or outcomes**

In the following section we describe in detail our approach, activities and outcomes of our priority engagement themes: climate change, nature and biodiversity, and human rights, as well as the cross-cutting themes policy dialogue and sustainability disclosure.

#### **1. Climate change**

With our firm commitment to our investment portfolios having net-zero greenhouse gas (GHG) emissions by 2050 at the latest, we believe investors can play an important role in tackling climate change and transitioning to a low-carbon economy.

In line with this commitment, we have set short-term targets to reduce emissions intensity from Storebrand's total listed equity, corporate bond and real estate investments by 32% by 2025, with 2018 as the base year. We have already surpassed our 2025 target, and have set a new target of 60% emissions intensity reduction for listed equity and fixed income investments by 2030, as well as targets for real estate, infrastructure and private equity. The targets are described in our Climate Policy. Furthermore, Storebrand has a target for 42% of our portfolios' listed equities and corporate

bonds to have set validated science-based targets by 2027 (based on AUM). The target has been approved and validated by the Science Based Targets initiative (SBTi).

To achieve these targets, we have designed an engagement approach to create an impact in the real economy and encourage companies to define and implement climate strategies and align with the goals of the Paris Agreement and reaching net-zero emissions by 2050 or sooner. We will continue to engage with companies in sectors such as energy, transportation, consumer staples, materials, and industrials. Our participation in Climate Action 100+, the Institutional Investors Group on Climate Change (IIGCC) and the Principles for Responsible Investment (PRI), connects us with like-minded investors in platforms for collaborative engagement on this theme.

### Top emitters

Over the past years, our emphasis has been on the emitters that generate the biggest amounts of owned emissions in our portfolios, and companies that have significant impact on ecosystems with high carbon value. Some of these dialogues have been carried out at the C-suite level and through our participation in the Climate Action 100+ and the Institutional Investors Group on Climate Change (IIGCC). From 2025, this engagement program was extended from 20 to 30 highest-emitting companies where we continue to assess the companies' ability to transition, by monitoring developments in emissions and whether climate targets are integrated into strategy, investment choices and reporting.

### Climate laggards

As part of our engagement strategy, we have also identified companies that are not adequately preparing for a transition to a low-carbon economy. Storebrand's approach to these laggards is unsentimental and data-driven. By using a "traffic light" system, we categorize companies based on their carbon performance and management score. Where these companies are held in active portfolios, they have been flagged to portfolio managers, who can engage further on the company's climate approach ahead of voting. If significant improvements are not observed, we vote against approval of the financial statements and management at their Annual General Meetings.

### Lobbying

In the context of climate policy, we believe that investors, companies and governments need to work together on ambitious solutions to achieve the Paris Agreement. Negative corporate interest, often represented by third-party organisations, can hinder policy action that aims to mitigate the impacts of climate change. This can cause issues for investors, including legal and reputational risks, and long-term portfolio volatility. We expect consistency in companies' policy engagement in all geographic regions; and to ensure that engagement conducted on their behalf or with their support is aligned with the Paris agreement, in turn protecting the long-term value in our portfolios across all sectors and asset classes.

Through data provided by InfluenceMap, we have identified companies for dialogue to ensure that their political footprint matches their public climate pledges. While more companies are disclosing their lobbying activities than previously, a significant gap remains between companies' public climate pledges and the actions of the trade associations they fund.

### Collaborative alliances

Storebrand AM is part of several key collaborative alliances of investors are currently driving action to achieve climate targets, though the landscape shifted significantly in early 2026 following a turbulent 2025.

- Climate Action 100+: A large-scale engagement initiative focusing on 165 of the world's highest-emitting companies. As of 2026, it remains a primary platform for proxy season stewardship, helping investors coordinate votes on climate-related shareholder proposals.
- Net Zero Asset Managers (NZAM) Initiative: After suspending activities in January 2025 due to political and regulatory pressure, this initiative officially relaunched in February 2026. It now has a more flexible framework that allows its 250+ signatories to set their own specific targets rather than a single global 2050 mandate.
- Institutional Investors Group on Climate Change (IIGCC): Leads European efforts with over 400 members, focusing in 2025–2026 on "net zero implementation" and emerging requirements regarding nature and biodiversity.

### Main actions and outcomes in 2025 – Climate Change

In 2025 we had 366 engagements related to climate change, of which 66 were bilateral, 24 were collaborative and 276 we supported as signatory only. During 2025, we voted on 72 explicitly climate-related proposals at annual shareholder meetings, out of which we voted 56 times against company management's recommendations.

We also continued our practice of voting against company financial statements or against relevant Board Directors, at companies that we evaluate as scoring poorly on climate risk management. In 2025 we voted against 9 companies for this reason.

In 2025, Storebrand Asset Management successfully met its primary intermediate climate targets, including a significant reduction in portfolio emission intensity and a substantial increase in climate solution investments. Our stewardship efforts shifted from asking companies to set commitments to demanding verifiable transition plans. Despite geopolitical challenges, we continued to seek out the full transition readiness of our portfolio companies, including their lobbying activities. Our assessment shows that while companies are progressing at different speeds across regions and sectors, transition pathways remain uneven, shaped by diverse policy environments, market

conditions and access to capital, particularly in emerging and developing economies. Throughout 2025, most companies we engaged with disclose evidence of board-level oversight for climate risks and have set long-term net-zero targets for 2050. We have successfully moved the needle on "what" companies plan to do. However, the "how" remains the sticking point. While we see a significant share of the companies reducing their absolute Scope 1 and 2 emissions in 2025, only a few of these reductions align with the 1.5°C pathway required by the Paris Agreement. The most concerning "laggard" indicator in 2025 is capital allocation. Very few of the companies have disclosed credible transition plans that clearly link their medium- and long-term targets to their financial spending. Perhaps most damaging to the global transition is the plateau in corporate climate lobbying. In 2025, Storebrand Asset Management reached a definitive turning point in its climate lobbying stewardship. Most notably, after years of unsuccessful engagement and co-filing a resolution, Storebrand officially divested from Toyota Motor Corporation in Q2 2025, due to persistent misalignment between the automaker's lobbying activities and the goals of the Paris Agreement.

## **2. Nature and biodiversity**

Biodiversity loss is identified as a critical systemic risk threatening global economic stability, financial markets, and human well-being. We believe nature loss will affect the capacity of our long-term economic growth and is likely to have implications for long-term asset returns. Failure to recognise business dependencies and impacts on nature exposes companies, and the financial institutions that invest in them, to 'hidden' risks. Protecting nature is therefore an integral part of our commitment to sustainability. The Intergovernmental Panel on Biodiversity and Ecosystem Services (IPBES) highlights five direct drivers to biodiversity loss, namely land and sea use change, climate change, pollution, natural resource use and overexploitation, invasive alien species. In our work we prioritize the most material sub-industries and companies, from the perspective of nature-related impacts and dependencies, to ensure that these companies are mitigating their potential negative impacts. Our expectations to companies are built on the mitigation hierarchy that is set out in the International Financial Corporation's (IFC) Performance Standard 6 and guided by Science-Based Targets Network (SBTN) and Taskforce on Nature-related Financial Risks (TNFD).

### **Deforestation**

Since adopting a Deforestation Policy in 2019, our ambition was to make best efforts to eliminate commodity-driven deforestation from our portfolios by 2025. We have fulfilled that commitment through screening our portfolios, exercising active ownership based on best practice expectations to companies, using exclusion as a tool in severe cases, and disclosing on our activities and results. However, we recognize that deforestation remains a complex, systemic risk requiring action from stakeholders across sectors and industries. Actions taken by investors like Storebrand AM are necessary, but not by themselves sufficient to eliminate deforestation or related financial risks. We remain committed to use our best efforts to combat deforestation risks, building on progress made and improving wherever possible.

As part of this commitment, we engage with companies involved in the production, trade, use, or financing of forest-risk soft commodities, as well as mining. Much of this work in 2025 was carried out through the Finance Sector Deforestation Action (FSDA), which delivered its final progress report in Q4 2025, documenting the meaningful progress made on deforestation-related risks since the initiative's inception four years ago.

Policies and regulations that protect forests and promote sustainable land use and traceable supply chains, are important to reduce financial risks arising from nature loss. We engage policymakers in Brazil, Indonesia and import markets like the EU, the UK and the USA, through the collaborative Investor Policy Dialogue on Deforestation, of which Storebrand AM's CEO where co-chair of the Brazil working group.

In the runup to the COP30 climate conference, Storebrand AM was among the very first signatories of the Belém Investor Statement on Rainforests – a united call from investors urging governments to strengthen forest protection and align public policy with global nature goals.

#### Sustainable seafood

Seafood is one of the world's most highly traded and valuable commodities, with global demand expected to double by 2050. Yet a significant amount of seafood related assets and revenue may be at risk due to overfishing, habitat degradation, nutrient pollution and disease. We engage with companies, particularly within aquaculture, to reduce the sector's environmental impacts, including biodiversity loss. We expect the sector to address issues such as pressure on wild fish stocks, habitat loss, antimicrobial resistance (AMR), pollution due to use of chemicals and waste, and animal welfare.

#### Extractives in ecologically sensitive areas

We prioritise engagement with companies that operate or source from ecologically sensitive areas such as the deep sea. We will expand to other ecologically sensitive areas as data improves. Following the precautionary principle, we will not invest in companies that are directly involved in deep-sea mining, until more scientific knowledge is developed on the impacts. We will also engage with downstream companies that are involved in extractives in the deep sea.

#### Collaborative alliances

- Storebrand AM is part of several key collaborative alliances of investors are currently driving action to achieve nature targets:
- Finance for Biodiversity (FfB): This is a high-level commitment platform for financial institutions (banks, insurers, and asset managers). Signatories commit to protecting and restoring biodiversity through their investment activities and to disclosing their impacts by 2025.

- Finance Sector Deforestation Action (FSDA): A global coalition of investors, launched at COP26, that works collectively to reduce deforestation risk in portfolios and engage companies and banks based on joint expectations for deforestation-free practices.
- Investor Policy Dialogue on Deforestation (IPDD): A targeted coalition focusing specifically on the financial risks of deforestation. This group engages directly with governments (including Brazil, Indonesia and the EU) promoting policies to protect forests, ensure sustainable land use and increase traceability of supply chains.
- Nature Action 100 (NA 100): It targets 100 "systemically important" companies with the highest impact on nature (e.g., consumer goods, heavy industry, and chemicals).
- UNPRI SPRING: It focuses on the political and policy influence of companies.
- Taskforce on Nature-related Financial Disclosures (TNFD) Adopters: While TNFD is a framework rather than an alliance, the "Early Adopters" group functions as a powerful coalition.

#### Main actions and outcomes in 2025 – Nature and Biodiversity

In 2025 we had 244 engagements related to nature and biodiversity, of which 5 were bilateral, 47 collaborative and 192 as signatory only.

We supported 11 shareholder proposals directly related to nature, biodiversity or deforestation at company general meetings, all of which were against company managements recommendations. In addition, we supported 9 shareholder proposals related to increasing circularity or reducing waste and plastic packaging.

We also continued our practice of voting against company financial statements or against relevant Board Directors, at companies that we evaluate as scoring poorly on deforestation risk management. In 2025 we voted against 7 companies for this reason.

In October 2025 we published an analysis of 100 Nordic companies, conducted jointly with the nature and biodiversity data leader GIST Impact, that demonstrates how nature-related portfolio assessments can inform investment strategies, sharpen stewardship approaches and support alignment with global biodiversity goals. We will use these findings to focus our stewardship where it matters most:

- Identifying the most significant nature-related impacts across our portfolios.
- Targeted engagement with companies in high-risk sectors and locations such as manufacturing, forestry and transportation, and those operating in or near Indigenous lands, to reduce environmental pressures and build resilience.
- Monitoring company targets and performance over time on, for example, water management and biodiversity impacts, and alignment with evolving reporting standards.

- Driving transparency and accountability in line with frameworks such as TNFD and GRI.

In Q2 2025 we published the results of our annual screening of deforestation risks in our portfolios. The results show that our risk profile and exposure remain roughly the same as in the previous year. While the methodology for the analysis has remained the same, the degree of reliability of the analysis is now slightly better, as our data partner Forest IQ has increased the number of companies and made some improvements to the underlying data.

In 2025, Storebrand Asset Management solidified its position as a global leader in nature- finance. Storebrand received the Finance for Biodiversity "Collaborative Leadership for Nature" award. The award specifically highlighted Storebrand's proactive role in moving the financial industry beyond individual action toward collective impact. Storebrand was recognized for its role in shaping the collaborative engagement initiative Nature Action 100 and the Finance for Biodiversity.

Storebrand's 2025 nature engagement work was defined by a "forceful" approach to stewardship, particularly as it reaches the deadline for its primary 2025 deforestation and biodiversity disclosure goals. Our assessment of the engagements revealed a "mixed progress" landscape. More companies are disclosing a commitment to protect nature, but only a handful provide evidence of a comprehensive materiality assessment of their nature-related dependencies and impacts. While we also note more nature-related targets were set to reduce impacts, companies are not able to prove these targets stemmed from rigorous assessments of material risks. There is a growing trend of companies aligning their disclosures with the Taskforce on Nature-related Financial Disclosures (TNFD) recommendations, which increased significantly in 2025, however, disclosure regarding the rights of Indigenous Peoples and local communities to remain severely limited to a few companies.

During the reporting period, Storebrand Asset Management undertook a targeted engagement with Swedish forestry companies SCA and Holmen, focusing on biodiversity protection and sustainable forestry practices. This engagement was prompted by concerns over potential withdrawal from Forest Stewardship Council (FSC) certification, a key global standard for responsible forest management. Storebrand engaged directly with companies' management, in collaboration with other Nordic investors, to emphasise the importance of maintaining FSC certification and to address broader issues such as the protection of old-growth forests, respect for Indigenous Sámi rights, and the need to secure Free, Prior and Informed Consent (FPIC). The dialogue was constructive and contributed to positive developments, notably both companies deciding to halt their planned withdrawal from FSC certification following stakeholder discussions. The engagement remains ongoing.

In 2021 Storebrand AM placed Bunge Global SA (Bunge) and Archer Daniels Midlands (ADM) on our Observation list, as an escalation step in our engagement with them on issues related to deforestation impact. In 2025 we undertook a new assessment of Bunge and ADM. While the assessment indicated that neither company had fully met our expectations, we decided that

Bunge had made sufficient progress to be removed from our Observation list, which means that we have lifted the investment restrictions linked to the company's previous status of being named on our Observation list. We are continuing to monitor and conduct dialogue with Bunge, as part of our regular engagement on deforestation risk. In the case of ADM, we decided to maintain the company on our Observation list.

In October 2025, the FSDA (Finance Sector Deforestation Action) published its final progress report, marking the conclusion of an initiative that – since its launch at COP26 – had brought together leading investors to tackle deforestation as a systemic financial risk, delivering key milestones including universal policy adoption among participants, over 100 company and bank engagements, and stronger corporate disclosure on traceability and deforestation-free supply chains. With the FSDA's work now complete, Storebrand AM is carrying the agenda forward as part of IIGCC's Deforestation Investor Group (DIG), a broader platform designed to mainstream investor action to halt deforestation and protect value across the financial system.

In 2025, Storebrand Asset Management solidified its position as a global financial leader opposing the premature start of Deep Sea Mining (DSM). Our dual-track strategy focused on domestic political advocacy in Norway and international policy engagement with the International Seabed Authority (ISA). The year concluded with a historic breakthrough: a four-year suspension of DSM in Norwegian waters and a continued global "precautionary pause" at the ISA. The most significant achievement of 2025 was the shift in Norway's domestic policy, where Storebrand played a vocal role as a primary institutional critic. In December 2025, the Norwegian government agreed to halt all deep-sea mining licensing for the current parliamentary term (through 2029). This was a direct result of political negotiations for the 2026 State Budget

Storebrand continues to remain a key backer of the Business Statement Supporting a Moratorium on Deep Sea Mining, alongside global partners. Storebrand will continue to monitor the ISA's development of environmental thresholds. Our focus will shift toward alternative solutions, such as circular economy investments that reduce the demand for deep-sea minerals.

### **3. Human Rights**

Storebrand AM will not invest in companies that contribute to severe and systematic breaches of international humanitarian law and human rights. We will promote the respect of human rights by engaging with investee companies, policymakers and standard-setting bodies to tackle systemic human rights risks and create enabling environments for responsible business conduct that is grounded in respect for human rights and access to remedy for affected rightsholders.

To promote respect for human rights, we are prioritising three themes within our engagements during the 2024-26 period:

1. Reducing inequalities and promoting a just transition

2. Conflict and high-risk areas
3. Digital rights

Embedded in these engagement areas is our work towards achieving our two main social targets:

1. Substantial alignment with the United Nations (UN) Guiding Principles
2. Living wages acknowledged for target sectors

Our engagement work is based on the UN Guiding Principles and OECD (Organisation for Economic Cooperation and Development) Guidelines; the Norwegian human rights due diligence law (Transparency Law); the EU Corporate Sustainability Due Diligence Directive; UN human rights conventions and declarations and ILO conventions and international humanitarian law.

### Reducing inequalities and promoting a Just Transition

According to the UN, inequality is growing for more than 70% of the global population, exacerbating the risks of divisions and hampering economic and social development. Income disparities and a lack of opportunities are creating a vicious cycle of inequality, frustration and discontent across generations. Storebrand aims to tackle this trend by focusing its engagements with companies in three areas: eliminating forced labour, promoting living wages and encouraging a Just Transition. The latter focus area addresses the potential negative effects that a transition to a low carbon economy may have on workers and communities. These issues can cause material risks to companies' operations, but the greater risk is generally in companies' supply chains.

Regarding forced labour in supply chains, we are focusing on the textile and renewables sectors by participating in an Investor Alliance for Human Rights initiative on forced labour including Uyghur forced labour.

Our work on living wages is focused on the agrifood and food retail sectors and is conducted through the Platform Living Wage Financials. Our participation in PRI Advance focuses on the metals and mining sector as well as the renewables sector and covers forced labour, living wages, labour rights as well as Just Transition with a strong focus on the rights of Indigenous Peoples and local communities. Through the World Benchmarking Alliance, we engage with oil and gas companies on Just Transition, with a focus on labour rights in this context.

### Conflict and high-risk countries

Companies with operations in conflict-affected and high-risk areas (CAHRA) are exposed to a higher risk of involvement in human rights violations. Conflict-affected areas are identified by the presence of armed conflict and widespread violence. Some of the worst human rights abuses involving business occur amid conflict over the control of territory or resources and where central governmental control is weak or has broken down completely, or in territories whose people have

not yet attained a full measure of self-government and thus have difficulty to defend themselves and exercise their self-determination rights.

We expect companies we invest in to exercise extreme caution when operating in these areas by conducting heightened human rights due diligence so that their operations do not contribute to conflict. Our actions on this theme are twofold:

- reactive engagement with companies flagged for contribution to conflict
- collaborative pro-active engagement aiming to ensure enhanced human rights due diligence in CAHRA in general with two high-risk sectors: the information and communication sector (ICT) and the renewables sector within the Investor Alliance for Human Rights CAHRA's project, together with the Heartland Initiative and the Peace-Nexus Foundation.

### Digital rights

Digital technologies can be used to stimulate engagement and democratic participation. Everyone should have access to a trustworthy, diverse and multilingual online environment and should know who owns or controls the services they are using. This encourages pluralistic public debate and participation in democracy.

However, there is a need to create a digital environment that protects people from disinformation, surveillance, discrimination, information manipulation or other forms of harmful content in addition to job displacement. Everyone should be empowered to make their own, informed choices online - including when they interact with artificial intelligence tool and algorithms.

Our dialogue with companies covers workers, consumers, societal and existential risk as we refer to the Artificial Intelligence OECD Principles, the work by the UN B-Tech group on Advancing Responsible Development and Deployment of Generative AI, in addition to emerging regulation in this field such as the EU Digital Service Act and the EU AI Act. Specifically, regarding AI, Storebrand AM expects companies to conduct ongoing human rights impact assessments to be undertaken by businesses, both AI providers and AI users, at all stages of the product and service cycle.

We participate in several initiatives: the Investor Alliance on Human Rights' initiative on digital rights; the Swedish Council of Ethics-led initiative on Big Tech and the World Benchmarking Alliance Collective Impact Coalition for Ethical AI. Storebrand AM is also involved in investor initiatives that are advocating for robust digital rights regulation and giving feedback to lawmakers in the EU, through the Investor Alliance for Human Rights.

### Main actions and outcomes in 2025 – Human Rights

In 2025 we had 342 engagements related to human rights, of which 66 were bilateral, 62 collaborative and 214 as signatory only.

In 2025, we voted on 174 proposals at company annual general meetings, of which 65 proposals were related to human rights, labour practices, discrimination, or digital rights and safety. We opposed management recommendations in 51 of these 65 votes.

### Conflict and high-risk areas (CAHRA)

In 2025, we continued to be involved in the Investor Alliance for Human Rights ("Investor Alliance") CAHRA project, engaging with companies to create improved heightened human rights due diligence in conflict affected areas. Together with the Investor Alliance, Heartland Initiative, and Peace Nexus and a select group of investors, we continued developing and piloting a process for identifying, analysing, prioritizing, and managing portfolio risk linked to business operations and relationships in CAHRA by engaging with companies within the Information Communication and Technology (ICT) and Renewables sectors. The project, named Investor Engagement on Conflict-Affected and High-Risk Areas, has been on-going since 2023.

In the second quarter of 2025, Storebrand was part of a group of investors that collectively issued a letter to companies on human rights policies and practices in conflict areas. The group assembled 23 shareholders, asset managers, and financial industry international stakeholders representing more than 980 billion euros in assets under management and the French Sustainable Investment Forum (FIR). We were supported in this initiative by the International Federation for Human Rights (FIDH) and expertise of several NGOs and foundations. In concrete terms, the letter warned companies that in such contexts, respect for internationally recognized human rights and international humanitarian law (IHL) can only be guaranteed by a set of reinforced and proactive heightened human rights due diligence measures on the part of companies. Together, we jointly presented detailed expectations for companies to adopt and implement comprehensive policies and processes, in relation to their exposure to CAHRA, that respect both internationally recognised human rights and IHL, and are consistent with all applicable regulations, principles and guidance.

Along with this, during Q4 2025 we also joined a newly formed Investor Working Group on Defence Tech & Responsible Investment hosted by the Investor Alliance for Human Rights, the Business and Human Rights Resource Center and the Heartland Initiative. This working group is created in response to the growing instability. The defence industry has been rapidly expanding and diversifying, increasingly integrating emerging technologies and extending to the militarization of police and border security forces. The "defence tech" sector now blurs the lines between the technology and defence industries. This trend is characterized by the collection and weaponization of personal data through state-backed surveillance, the increasing use of artificial intelligence (AI) in military operations, and the proliferation of dual-use technologies in conflict.

In November, Storebrand AM was a signatory to the Investor Statement on Autonomous Weapons, together with 20 other investors, as part of our ongoing effort to address product risks and systemic risks in this area. With geopolitical tensions and armed conflict rising around the world, and a lack of sufficient national and international laws and conventions governing these products, the ongoing proliferation in their development and usage, poses an urgent and grave threat to human rights and global stability. Our action was based on our assessment that only by working together, can investors and the public achieve the goal of implementing regulations on autonomous weapons that ensure market stability, uphold human dignity, and foster sustainable economic development.

### Digital rights

With AI risks continuing to rise, Storebrand has been working with the Collective Impact Coalition for Ethical Artificial Intelligence by the World Benchmarking Alliance. The coalition for Ethical seeks to ensure that digital technology companies integrate human rights and ethical considerations into the development, deployment, and procurement of AI. During 2025, together within the coalition, we continued our engagement with 76 companies within three 'core' tech industries: hardware and semiconductor giants, telecom providers, and software firms.

### Reducing inequalities and promoting Just transition

In 2025, Storebrand continued its work engaging with companies within the Platform Living Wages Financials (PLWF) aiming to enable living wages and living incomes in global supply chains. In 2025, the group conducted another round of assessment of companies within the garment and apparel, the agrifood and food retail sectors.

### Reducing inequalities and promoting a just transition

For several years, Storebrand has been engaging with the global retailer Amazon.com on various aspects of human rights and labour. The impetus for the engagement based on our assessment that there is a gap between the company's stated commitments in these areas, and how it implements them. We believe that this gap is a reputational and operational risk that the company should address. Further action was taken in this engagement with Amazon.com during the first quarter of 2025. Storebrand had been part of a group of investors seeking to file a shareholder proposal to be voted on at the 2025 Amazon.com annual general meeting (AGM). This proposal, which focused on the company's implementation of its own stated commitment to the principle of freedom of association of its workers, was co-filed in December 2024. However, in early 2025, the US Securities and Exchanges Commission (SEC) granted Amazon's request to exclude our proposal from the proxy. Within the same group of investors, we also collaborated in early 2025 to issue a collective letter to two members of the Board at Amazon. com. The letter documented our concerns regarding the decision that the company took this year in Canada, to close all its Quebec warehouses and end the jobs of approximately 1700 full-time and 250 part-time workers. Whilst

specific outcomes may not have been achieved, we believe continued engagement on labour and human rights is an important activity to hopefully increase the value put on the topic by the company.

In July, Storebrand AM was part of a group of financial institutions that together formally called on the Board of Directors of the global retail giant Industria de Diseño Textil, S.A., popularly known as Inditex, to be transparent on several issues surrounding its handling of supply chain due diligence and living wages in Cambodia. Cambodia has a significant garment manufacturing industry that is dominated by foreign owners, is mainly export-driven and is deeply integrated in global supply chains. However, the country is also characterised by having a significant portion of its population living below the poverty line, with low levels of education, creating a large pool of unskilled, low-cost workers that are highly vulnerable. Therefore, we have collectively issued a joint call to Inditex to answer a targeted set of questions on the issues and take specific actions to provide transparency on them.

### Conflict areas and high-risk areas

During 2025, we conducted another round of our periodic screening of our portfolios for risks related to conflict and high-risk areas (CAHRA). In this work we have clear guidelines for what kind of activities we should prioritize, so that our advocacy work has the greatest possible impact on the situation on the ground. In 2025 our screening resulted in 2 exclusions, one of which was our decision in Q3 2025 to exclude Caterpillar (CAT) from our investment universe based on an unacceptable risk of the company contributing to severe and systematic violations of international humanitarian law in the Occupied Palestinian Territories.

During the first quarter of 2025, the Investor Engagement on Conflict-Affected and High-Risk Areas group --of which Storebrand is part of--published the results of its project: a guide titled "Navigating Portfolio Exposure to Conflict-Affected and High-Risk Areas: Practical Guidance for Investor Engagement with Companies". The report is a practical, rights-based contribution to the limited guidance currently available for investors seeking to take a systemic approach to managing CAHRA risks across their portfolios and to those companies pursuing better policies, practices, and governance measures in response to today's volatile geopolitical landscape. The group also issued specific recommendations to the companies engaged on how to improve their heightened human rights due diligence in CAHRA.

### Digital rights

At the end of 2025, the Collective Impact Coalition for Ethical Artificial Intelligence within the World Benchmarking Alliance – of which Storebrand is part of--published a second annual progress report, documenting a uniquely detailed view of how responsive individual companies and industries have been to investors' outreach on ethical AI. While AI principles are becoming more common place, details on how they are implemented remain elusive. Though companies across the industry

spectrum are creating new governance structures dedicated to ethical AI, CIC investors and WBA researchers found considerable gaps in transparency regarding how they translate into practice. As a group we believe that the level of transparency provided by report can help us boost engagement on the issues.

#### Reducing inequalities and promoting Just transition

At the beginning of 2026, the Platform on Living Wage Financials (PLWF) – of which Storebrand is part, published a report with the results of the engagement rounds and assessments conducted in 2025. The report shows some progress, albeit unevenly, in the living wage policies and practices of the companies in the Garment & Apparel sector. Within the Food Agriculture and Food Retail sector, the report shows progress in terms of policies and procedures, but when viewed in terms of on-the-ground impact, these changes have not yet consistently translated into higher wages. Looking ahead, 2026 will be a crucial year for moving from policy development to measurable impact in living wages. We will continue working within the PLWF coalition to push the companies in scope to implement living wages and living incomes in their entire supply chains, and to track the effectiveness of these measures.

### **Storebrand AM disclosure under Norway's Transparency Act (Åpenhetsloven)**

During 2025, we conducted human rights due diligence in our portfolios to map, identify and assess human rights risks, as well as to implement measures to avoid, mitigate and/or stop those risks in our portfolios.

Among the main risks identified are the following: poor working conditions in supply chains (forced labour, child labour, poverty wages, gender discrimination and sexual harassment; anti-unionising activities); communities and Indigenous Peoples' rights; human rights and humanitarian law violations in conflict areas; human rights in high risk countries; digital rights (privacy, censorship, discrimination online, children's rights online); rights connected to a Just Transition.

Among the main industries identified as high risk are the following: Apparel and Garment; Agrifood; Renewable energies; Oil and Gas; Metals and Mining; Construction and Infrastructure; Communication and Information Technologies; Private security companies, and Aerospace and Defence.

As part of our human rights' due diligence, we have implemented different measures to manage and mitigate human rights risk such as reactive and proactive engagement, co-filing of shareholder resolutions and proxy voting, exclusions, risk-based sale of assets, observation list and pre-investment screening/ineligibility for investing.

We formally excluded four companies related to human rights issues, based on conduct-based criteria for human rights and international humanitarian law, Indigenous Peoples' rights and labour rights. We also excluded five companies as risk-based sale of assets under our criteria for human rights and international humanitarian law and high risk of severe labour rights violations. Furthermore, eight companies were excluded during pre-investment screening.

We also excluded 14 new companies under our controversial weapons criteria. In addition, companies in breach of EU SFDR PAI 10 have been flagged as non-sustainable and therefore, do not qualify for Article 9 funds or the sustainable investment part of Article 8 funds. We have also disqualified for Article 9 funds all companies linked in UN reports to human rights violations in Gaza and the occupied Palestinian territories.

In addition, we have had reactive individual dialogue with many companies on human rights issues that have not led to exclusion, either because the engagement is ongoing, the severity of the case has not warranted an exclusion, or a final decision on exclusion has not yet been made. Conflict Affected and High-Risk Areas (CAHRA) was a theme that was prioritised for reactive dialogue in 2025 with 69 companies engaged, in particular regarding occupied Palestinian territories but also Western Sahara and Ukraine.

We have had proactive dialogue with 12 industries in several investor alliances focusing on human rights, where the aim is to lift sector standards in order to avoid harm. We engage together with other investors, for more leverage, a more effective use of engagement resources and knowledge sharing. Some of the themes we have engaged on proactively are: living wages (engaging with 50 companies within the textile and agrifood sectors); digital rights and Ethical AI (engaging with 76 companies (out of 200 in scope) within the Communication and Information Technology sector); Forced labour (48 companies within textile, IT and Renewable sectors), and CAHRA (companies within the IT and renewable sectors).

We co-filed two shareholder resolutions during 2025 related to human rights, both of them concerning digital rights, at Meta Platforms Inc and Alphabet Inc.

## Policy dialogue

We actively engage with policymakers and other relevant stakeholders to promote sustainable business practices aligned with the SDGs and global agreements on climate, nature, and human rights through direct engagements, consultations, and investor alliances like Finance for Biodiversity and IPDD.

Policy dialogue is also a cross-cutting theme that spans a range of thematic areas. While voluntary action by companies is important for achieving progress, the regulatory frameworks for sustainable business, as well as our main engagement themes, are determined by international treaties and national policies. Therefore, engaging with policymakers and other stakeholders in a transparent and responsible manner, is an essential part of our strategy to promote business practices aligned with the Sustainable Development Goals (SDGs) and global agreements on climate, nature and human rights. This may entail direct engagements with relevant policymakers, standard setters or trade associations, participating in consultation processes, co-signing open letters or presenting investor alliance statements at UN summits.

## Sustainability disclosure

We advocate for standardised sustainability reporting by all companies to enhance transparency, manage sustainability risks, and ensure comparable and reliable information for better investment decisions globally.

Sustainability disclosure is a cross-cutting engagement theme as the importance of consistent, reliable, and verifiable reporting is relevant across the broad range of E, S and G themes. Storebrand AM believes that all companies should report on standardised and company-specific sustainability metrics. This will benefit all stakeholders and increase transparency. The level of oversight and reporting on ESG-specific issues are good indicators of how a company measures and manages its exposure to sustainability risks, which is essential to us as investors. It is in everyone's interest that companies report on how sustainability issues affect their business and how their operations and products/services impact people and the environment. Currently, there are differing standards and regulatory requirements on corporate sustainability disclosure, leading to non-comparable and insufficient information. This results in investors needing a better overview of our portfolio companies' exposure to sustainability risks. This information must be comparable and verifiable to channel our investments toward the most sustainable companies.

The reporting landscape is changing rapidly. Increased reporting will improve the flow of sustainability information to investors and others alike. It will make sustainability reporting by companies more consistent so that investors, banks, and regulators can use comparable and reliable sustainability information. Companies based in the EU will be subject to regulations that streamline and demand such reporting, but we will demand the same disclosure from publicly listed companies in all countries.

We will continue to encourage companies to provide enhanced corporate disclosures in line with TCFD and TNFD recommendations, also in line with CSRD (Corporate Sustainability Reporting Directive), CSDDD (Corporate Sustainability Due Diligence Directive) and the Norwegian Transparency Act. We will also encourage companies to improve their reporting on Principle Adverse Impact (PAI) indicators, which will allow us to better identify companies that are laggards and leaders and to implement our commitments and requirements in relation to the EU Sustainable Finance Disclosure Regulation (SFDR).

**Explain how and why you have escalated engagement activities where you have done so, and discuss any progress made**

Storebrand applies a structured escalation framework when engagement does not lead to sufficient progress. The process is described in our Sustainable Investment Policy and annual Sustainable Investment Reviews:

Trigger for escalation

- If companies fail to meet minimum expectations after repeated dialogue, or where risks remain material

Escalation tools

- Raise issues directly with the Board
- Issue public statements
- Collaborate with other investors
- File or co-file shareholder resolutions
- Vote against Board members
- Place companies on an observation list

Further escalation pathways

- Placing companies on our Observation list with defined improvement expectations; failure can lead to exclusion from the investable universe
- In serious cases, escalation can move directly to divestment/exclusion, especially for norm breaches

Policy approach

- Storebrand seeks to exhaust escalation options before exclusion, particularly in proactive engagements
- Reactive engagements (e.g. norm violations) are more likely to lead to exclusion if dialogue fails

In summary, escalation is graduated, engagement-led, and outcome-focused, with exclusion used as a last resort when companies fail to respond adequately.

### Examples of escalation and deescalation:

Climate lobbying: Toyota Motor Corporation stands as a significant example of Storebrand AM's willingness to escalate engagement all the way to exclusion. Storebrand initiated a structured engagement with Toyota more than four years ago, documenting its expectation that companies support cost-effective climate policy and maintain consistency in their policy engagement across all geographies. Despite some improved transparency over this period, Toyota continued to actively lobby against climate-related regulation and policies – opposing phase-outs of internal combustion engine vehicle sales, leading negative lobbying efforts against battery electric vehicle policies in numerous jurisdictions and using its central positions within industry associations to push back against ambitious climate rules globally. In Q2 2023, Storebrand AM escalated by co-filing the first-ever climate-related shareholder resolution in Toyota's history at the company's AGM, aiming to protect long-term shareholder value – however, the resolution did not succeed due to Toyota's voting structure. Following the failure of the resolution and continued lack of material progress, Storebrand concluded in Q2 2025 that Toyota was not capable or willing to meet its expectations and excluded the company from its investment universe in accordance with its climate lobbying exclusion criterion.

Deforestation: In 2021 we placed Bunge Global SA (Bunge) and Archer Daniels Midlands (ADM) on our Observation list, as an escalation step in our engagement with them on issues related to deforestation impact. Since then, we have maintained close dialogue with the companies, as well as escalating further by co-filing a shareholder proposal at Bunge's AGM, which was withdrawn after the company agreed to some of the investor group's requests, and improved its target for deforestation-free operations. In Q3 2025 we undertook a new assessment of Bunge and ADM. While the assessment indicated that neither company had fully met our expectations, we decided that Bunge had made sufficient progress to be removed from our Observation list, which means that we have lifted the investment restrictions linked to the company's previous status of being named on our Observation list. We are continuing to monitor and conduct dialogue with Bunge, as part of our regular engagement on deforestation risk. In the case of ADM, we decided to maintain the company on our Observation list.

### Exclusion

All our holdings are continuously screened by using data from various third-party data providers. As part of the exclusion process, our investment universe is monitored daily for potential conduct-based breaches, and screened quarterly to assess if companies are in breach of any of our criterion.

### Exclusion summary 2025

As of 31 December 2025: 421 companies were excluded from all our investment portfolios; 662 additional companies were excluded from certain of our funds, based on extra criteria; and 1 company was on our observation list.

Some examples of exclusions we made in 2025 were:

- Caterpillar (CAT) excluded for the unacceptable risk of involvement in violations of human rights in Palestine
- Phoenix Limited excluded based on involvement in violations of human rights in Palestine
- Toyota Motor Corporation, excluded for its persistent lobbying against climate-related regulation and policies; and its lack of transparency on the issues
- Eramet SA and PT Aneka Tambang, due to their involvement in deforestation and serious human rights violations linked to the Weda Bay Nickel (WBN) mining project in Indonesia
- Rio Tinto PLC and Rio Tinto Ltd, due to severe deforestation impact of a mining project in the Brazilian Amazon region.

Exclusion key figures 2025

Storebrand Exclusion List

This list details exclusions that apply to all our products, based on our extensive exclusion process that involves both internal and external data, and evaluations conducted by subject matter experts. Excluded companies are removed from Storebrand’s investment universe, which is an investment ecosystem that consists of over 4000 companies.

Exclusion category:	
Conduct-based exclusion – Environment	42
Conduct-based exclusion – Corruption and Financial Crime	12
Conduct-based exclusion - Human Rights and International Law	90
Tobacco	34
Controversial weapons	53
Climate - Coal	143
Climate - Oil sands	8
Climate - Lobbying	6
Arctic drilling	0
Deep-sea mining	1
Marine/riverine tailings disposal	5
Deforestation	25
Cannabis	4
State-controlled companies	23
<b>Total number of companies</b>	<b>414*</b>
No. of companies on observation list	1

\*Companies may be excluded on the basis of several criteria

Storebrand exclusion list extra criteria

This list details additional exclusions that only apply to selected funds and saving profiles. Storebrand’s extra criteria build upon the Storebrand Standard for sustainable investments. More information on the methodology behind these exclusions, on our website.

Exclusion category:	
Alcohol	72
Adult Entertainment	0
Weapons	68
Gambling	37
Fossil	497
<b>Total number of companies</b>	<b>662*</b>

\*Companies may be excluded on the basis of several criteria

## 4. Signatories actively exercise their rights and responsibilities

For listed equities:

### Voting records

Our Engagement and Voting policy is anchored with the Board of Directors in Storebrand ASA and adopted by the Board of Directors in Storebrand Asset Management AS. Under this policy, voting rights and other rights deriving from shareholdings shall be exercised solely in the common interest of the unit holders, with the aim of ensuring the best possible risk-adjusted return for the unit holders. The CEO of Storebrand AM, or the appointed representative, is responsible for ownership matters, including voting.

Storebrand AM has engaged ISS as an independent proxy voting service provider and proxy advisory firm. The proxy provider handles invitations to, and registration for, general meetings for our funds and produces comprehensive information about the individual portfolio companies. The proxy provider presents the agendas of the meetings and through the proxy advisory it provides us with research on all resolutions and voting recommendations, which we go into more detail on in Section 6 ("Signatories monitor and hold to account service providers. If you use proxy advisors, explain how you use the services of proxy advisors"). In 2025 we voted in accordance with recommendations of the ISS Sustainability Policy in 99.1% of cases.

Voting rights are exercised either directly as part of management or using a system for exercising voting rights (proxy voting). The following topics are of particular importance when exercising our shareholder vote:

- Insufficient information before a general meeting.
- Absence of a majority of independent Board members or independent management committees (remuneration, nomination, and audit committees).
- If the Company considers that the Board of Directors and/or Board members do not meet the requirements for sufficient competence and knowledge.
- Existence of mechanisms for preventing takeovers (poison pills, etc.) that counteract shareholders' final decision-making power in these matters.
- Unnecessary or indefensible changes in capital structure. Storebrand AM supports the principle of one share = one vote.
- Existence of remuneration structures for senior executives leading to conflicts of interest between management and shareholders.
- Unsatisfactory stewardship of climate, environment, fair labour practices, non-discrimination, and the protection of human rights.

All voting activities and rationales are published on the Proxy Voting Dashboard on the Storebrand website, link can be found here: [Storebrand AM - Proxy Voting Dashboard](#)

## **Disclose the proportion of shares that were voted on in the past year**

### Voting Statistics – Storebrand funds (including Delphi)

In 2025, we voted at 2,138 out of 5,022 company meetings, which amount to 42.6% of votable meetings. The meetings that we voted at correspond to 92% of our total equity investments, the same share as in 2024, and up from 90% in 2023.

We have prioritised voting where we consider it to have the highest possible impact, including meetings in companies that represent:

- Our largest holdings
- The Norwegian and Swedish markets
- Companies engaged by any active ownership initiatives that we are part of
- Meetings with environmental or social proposals on the agenda
- Oil and gas companies

Across 57,296 unique proposals available to vote, we voted on 26,399, corresponding to 46%. Votes were in line with management recommendations 91% of the time, with 9% contrary to management recommendations.

We voted at meetings held in a total of 55 countries. We voted most frequently in the USA, accounting for 21%, followed by China accounting for 14%.

### Votes on environmental and social proposals

We voted on 376 proposals in 2025 concerning environmental and/or social issues. Climate change continues to be the main topic of voting items related to the environment, with 72 directly climate-related proposals, of which we voted against management in 56 cases (77%), showing our commitment to promote decarbonisation aligned with the targets of the Paris Agreement.

We supported 11 shareholder proposals directly related to nature, biodiversity or deforestation at company general meetings, all of which were against company management recommendations.

We voted on 174 social-related proposals, with 65 pertaining to human rights, labour practices, discrimination, and digital rights and safety. We opposed management recommendations in 51 of these 65 votes.

## Voting Statistics – SKAGEN

For SKAGEN funds, we voted at 210 out of 213 votable company meetings, which amount to 98.6% of votable meeting. Across 478 ballots available to vote, we voted 469. Votes cast were in line with management recommendations 96% of the time, with 4% contrary to management recommendations. Meetings voted by market are primarily concentrated in Other (38.1%), the USA (18.6%), and Brazil (9.5%), with the remainder distributed across South Korea, Norway, Sweden, Canada, Denmark, the UK, Japan, and the Cayman Islands.

### **Describe the rationale for some of your voting decisions**

In 2025 we saw an escalating trend of a few activist shareholders filing proposals to push companies to eliminate Diversity, Equity and Inclusion (DEI) policies and practices. Storebrand voted against 49 such anti-DEI proposals throughout the year, in alignment with company managements' recommendations in all cases. None of these proposals managed to secure more than 9% support in the shareholder vote, with most being supported by less than 3% of votes. While this lack of support indicates that the vast majority of shareholders do not consider DEI as detrimental to company performance, it is part of a larger trend that is of concern: companies operating in or doing business with the United States are now under undue pressure to eliminate equal opportunities as a guiding principle for their employment practices; and to disregard previously stated goals of seeking to secure a Board with members from diverse backgrounds. As a result of this pressure, proxy voting advisers have announced that they will cease to consider board diversity as a factor when making their standard recommendations for director elections at boards of US companies. Storebrand AM considers well-balanced and diverse boards, in terms of competence, experience and background, to be beneficial to company performance and shareholder interests, and has instructed our proxy provider (and proxy advisor) ISS to continue to consider board diversity in its research materials and voting recommendations to us, in the US as well as other markets. We are closely monitoring developments to make sure that we use our shareholder rights to improve transparency, strengthen board accountability, and prepare companies for the transition to a more sustainable and inclusive economy.

### **Explain if any of the votes were part of an escalation process**

As part of our engagement with companies that score poorly on climate and deforestation risk management, in certain cases we use the escalation measure of voting against company financial statements or relevant Board Directors. In 2025 we voted against nine such companies with regards to climate and six on deforestation. This is part of our strategic engagement approach under the themes Climate Change and Nature and biodiversity.

### **Explain any conflicts of interest that arose related to voting**

While no particular instances of conflict of interest were identified connected to our voting, we are aware of possible risks connected to conflict of interest and take measures to avoid this risk. Storebrand AM has established guidelines for handling conflicts of interest to ensure safeguarding of customers' interests and compliance with relevant provisions laid down in laws and regulations.

The guidelines are applicable to all employees and are made available on our intranet. Storebrand AM has identified that persons who participate in the management or who are responsible for representing our funds during voting could potentially make decisions designed to benefit the value of private investments or exploit the voting rights for similar purpose. The conflict of interest is managed through the stipulation in the investment funds' investment guidelines that the investment funds may hold a maximum of 10% of an issuer's outstanding financial instruments. This minimizes the risk of the investment funds having a considerable influence over the issuer.

**For other asset classes: Explain how you have exercised relevant rights and responsibilities and provide examples**

Fixed Income Rights

We maintain close dialogue with issuers, leveraging our stewardship role when relevant and we have a realistic possibility to influence and potentially amend terms and conditions in alignment with sustainability objectives.

We are in dialogue with issuers in advance of issuance to give advice and recommendations. When the company in question comes to the market, the way this is incorporated will influence our investment decision. This will obviously be a concern for new investments and refinancing.

We maintain the capacity to seek access to information provided in trust deeds, although we have not done so yet. We are ready to leverage this access when relevant to our stewardship responsibilities, enhancing our ability to integrate sustainability considerations into investment decisions. This remains the case for 2025.

We review prospectuses and transaction documents when deemed relevant to ensure alignment with our stewardship objectives.

## **5. Signatories integrate stewardship considerations into their selection and oversight of external managers**

All Storebrand-branded funds are managed internally by Storebrand Asset Management under a unified investment and stewardship framework. Investment decisions and stewardship activities, including engagement and voting, are conducted by internal teams in accordance with group-wide policies and sustainability principles.

In addition to its internally managed strategies, the Storebrand Group provides access to selected third-party funds. This access is offered through the Group's life insurance entities and through Kron, Storebrand's digital savings and investment platform, and is separate from Storebrand Asset Management's investment operations. This is therefore outside the scope of this report, as it is not directly linked to decision-making or stewardship activities carried out by the Investment teams in Storebrand Asset Management.

So, this chapter is limited in scope to Storebrand Asset Management AS (Storebrand AM) and its conventional products. Storebrand AM's assets under management are managed directly by our own investment teams. Our in-house portfolio managers are responsible for investment decisions across equities, fixed income, and multi-asset operating within the frameworks set by our Sustainable Investment Policy and related thematic policies. Storebrand Asset Management does not appoint external investment managers to manage its own funds. All portfolio management for Storebrand-branded products is conducted internally.

However, Storebrand operates a fund platform through which a range of external asset managers' funds are made available to our clients. These external funds supplement our internal product offering and are selected, monitored and overseen by our Fund Selection team. It is in this context that stewardship considerations are integrated into the selection and oversight of external managers, as described in this chapter.

### **Explain how stewardship considerations have been incorporated into the tendering process and the design and award of mandates.**

Stewardship and sustainability considerations are embedded throughout our selection process for external fund managers. All funds and fund managers considered for inclusion on the platform are assessed through a balanced scorecard framework, in which sustainability is one of six evaluation areas. Each candidate must achieve a minimum score across all areas, including sustainability, in order to be admitted. This is a firm threshold that is not compromised.

Our due diligence covers both the fund management organisation and the specific investment team responsible for the fund. We assess qualitative and quantitative parameters, including: the manager's internal sustainability policies and governance arrangements; the investment team's knowledge, experience and track record of sustainability integration; the fund's mandate, holdings and ESG characteristics; and the manager's approach to engagement and voting. We also use the

MercerInsight platform as a tool for qualitative evaluation of external managers, providing structured assessments of ESG integration and stewardship capabilities that complement our own analysis.

As a baseline expectation, all external fund managers are required to be signatories to the UN Principles for Responsible Investment, or to be in a credible process of becoming signatories. For equity and fixed income strategies, new funds admitted to the platform are, as a general rule, expected to classify as at least Article 8 under the EU Sustainable Finance Disclosure Regulation. Exceptions require specific justification and are escalated to Storebrand AM AS's Investment Committee for decision.

All funds that carry the Storebrand or SPP name are required to follow the Group's exclusion criteria, including the supplementary product-level exclusion criteria. Where a replacement fund is selected for an existing category, it is expected to have the same or better regulatory classification than the fund it replaces. We also expect external managers to set a target for climate-neutral investments by 2050 and to demonstrate credible steps in that direction.

### **Considered not in scope**

As outlined in Section A, stewardship activities are conducted internally, and the firm does not delegate investment management to external managers. Accordingly, the expectations relating to engagement with external managers, the incorporation of stewardship considerations into their monitoring, and the escalation of engagement with external managers are not applicable. Stewardship responsibilities, oversight, and escalation processes are embedded within the firm's internal investment and ownership practices.

## **6. Signatories monitor and hold to account service providers. If you use proxy advisors, explain how you use the services of proxy advisors**

We use proxy advisor services from Sustainability Advisory Services (a segment within ISS's broader offering of proxy advisor services) which provide us research and voting recommendations through a speciality research policy chosen by Storebrand AM. The policy that we have chosen has clear sustainability characteristics that are in line with our voting preferences and in alignment with our various internal policies, not least our Engagement and Voting Policy. We use ISS's platform to execute our proxy voting. On this platform, we can access the advisory materials (research and recommendations) that we subscribe to through the Sustainability Advisory Services. We use these materials as one key data point in making our voting decisions, as they have been specifically chosen to align with our policies. Our voting practices are nevertheless governed by Storebrand AM's common voting policy and is always based on what is in the interest of the funds and of the unit holders. In the absence of a policy for a specific vote, the recommendations of the proxy advisor, based on the specialty policy chosen by Storebrand AM, are usually followed.

### **How you have monitored the quality and accuracy of their services.**

Storebrand AM monitors the quality and accuracy of ISS's services through a number of mechanisms, both systematic and judgement-based.

**Manual review and cross-checking:** The most direct form of quality monitoring is the manual review process described above. When the Risk and Ownership team reviews E&S resolutions independently of the recommendations made through the specialty policy we have subscribed to through ISS, it frequently becomes apparent where the ISS analysis is incomplete, based on inaccurate factual premises, or insufficiently attuned to the specific context of the company or the issue. These observations are noted by the team and contribute to our ongoing assessment of the proxy advisor's quality.

In terms of the proxy voting services, we receive notifications from our service provider ISS in case of any problems with casting and counting of votes. In addition, we regularly monitor ESG-relevant votes cast, through checking votes on high-profile companies, all votes on environmental and social shareholder resolutions, as well as extracting quarterly voting statistics. For example, we manually go through voting records to select "most significant votes" on ESG issues, and in that process, we check that votes have been approved and properly registered. Any errors are raised with ISS to identify causes and avoid repetition.

**Comparison against our voting policy:** We regularly assess ISS recommendations against our own voting policy to identify systematic divergences. Where we find that ISS recommendations on a particular category of resolution, for example, resolutions related to climate action or executive pay frequently diverge from what our own policy would indicate, we investigate the reasons for the divergence. In some cases, the divergence reflects a legitimate difference of approach or standard; in others, it may reflect a gap or error in the ISS methodology or analysis of the specific issues.

**Engagement with ISS on methodology and accuracy:** We maintain an ongoing dialogue with ISS Governance on the quality and accuracy of their service. Where we identify specific errors in research, for example, factual inaccuracies about a company's practices or disclosures, we report these to ISS and expect them to be corrected. More broadly, we engage with ISS on their methodology for assessing E&S resolutions, communicating our own views on appropriate standards and criteria and seeking to understand the basis of their recommendations.

**Annual service review:** We conduct an annual review of our proxy advisory service arrangement, which includes an assessment of the quality and accuracy of ISS's research and recommendations, the reliability of the voting platform, the adequacy of the coverage provided, and the responsiveness of ISS to our queries and feedback. This review also benchmarks the ISS service against alternative providers and emerging market developments to ensure that our service arrangement continues to meet our needs.

If you use investment consultants, explain:

Storebrand AM does not engage investment consultants in a role directly related to our stewardship activities. In limited circumstances, Storebrand AM may draw on external advisory expertise to support specific stewardship-related activities, for example, engaging sector experts or legal advisers to support the analysis of a particular engagement issue or working with sustainability-focused advisory firms on specific topics such as human rights due diligence methodology or nature-related risk assessment. However, these engagements are advisory in nature and specific to defined tasks; they do not constitute a structural reliance on investment consultants for the delivery of our stewardship programme.

No material changes were made to the use of investment consultants for stewardship-related activities during 2025.

### **Considered not in scope**

Where Storebrand uses external service providers in connection with stewardship, their role is strictly limited to operational and advisory support. For example, we use ISS as a proxy voting platform and for voting research and recommendations, but all voting decisions are made internally by the Risk and Ownership team in accordance with our own policies. A member of the Risk and Ownership team is dedicated to leading on, and monitoring, voting activity, and the team manually reviews all environmental and social resolutions against the proxy adviser's recommendations to ensure alignment with our own positions. Similarly, we use external ESG data providers to support our sustainability analysis, but the assessment, interpretation and decision-making remain fully internal. No engagement, voting or ownership activities are delegated or outsourced to any external party.

## **Bibliography**

### **UK Stewardship Code Submissions**

- [Storebrand AM UK Stewardship Code 2024 Submission](#)

### **Sustainable Investment Policy and Thematic Policies**

- [Sustainable Investment Policy](#)
- [Climate Policy for Investments](#)
- [Engagement and Voting Policy](#)
- [Policy on Nature](#)
- [Deforestation Policy](#)
- [Exclusion Policy](#)
- [Human Rights Policy](#)

### **Quarterly Sustainable Investment Reviews 2025**

- [Sustainable Investment Review Q1 2025 \(PDF\)](#)
- [Sustainable Investment Review Q2 2025 \(PDF\)](#)
- [Sustainable Investment Review Q3 2025 \(PDF\)](#)
- [Sustainable Investment Review Q4 2025 \(PDF\)](#)

### **Screening and Exclusion**

- [Screening & Exclusion \(overview page\)](#)
- [Exclusion List Q4 2025](#)
- [Exclusion List Extra Criteria Q4 2025](#)

### **Active Ownership**

- [Active Ownership \(overview page\)](#)
- [Engagement data \(ESGAIA\)](#)
- [Proxy Voting \(VDS Dashboard\)](#)

### **Reporting & Transparency**

- [Reporting & Transparency \(overview page\)](#)
- [Sustainable Finance Disclosure Regulation \(SFDR\)](#)
- [Awards & Memberships](#)

## **Business Policies and Guidelines**

- [Annual Reports](#)
- [Storebrand AM - Document Library](#)

## **Climate Data Whitepapers Published in 2025**

- [Magnificent Performance](#)
- [The Future of Paris-Aligned Investing](#)
- [Storebrand-Nature-Report-October-2025](#)

## **Climate Data Whitepapers Published in 2024**

- [Scope 3 Emissions in the UK Reporting Landscape](#)
- [Double Whammy: Decarbonisation and de-risking in developing economies](#)
- [Gridlock: The case for electricity grid investments in a Paris Aligned portfolio](#)

*Note: All links reference the storebrandam.com (2026 website). Some URLs may require market/language selection on first visit.*

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