



PUBLIC TRANSPARENCY REPORT

2024

Storebrand Asset Management

Generated 25-11-2024

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Storebrand Asset Management engages in responsible investment in order to secure competitive long-term returns for our clients. We regard sustainability as a significant driver of corporate value. Companies that manage current and future environmental and social opportunities and risks will emerge as leaders and are more likely to create a competitive advantage and long-term stakeholder value. Integration of sustainability data and perspectives help us identify risks and opportunities arising from environmental, social and governance factors, which in turn supports our efforts to achieve strong risk-adjusted returns for our clients. As a responsible shareholder and investor, we also aim to contribute to a more sustainable future and better world. We are determined to play our role in transition: decarbonizing the economy, protecting biodiversity and supporting inclusive growth. These strong convictions permeate our strategic plan for the coming years and will allow us to pursue our objective of generating long-term sustainable investment returns for our clients.

A sustainable approach to investing is important if we are to be good long-term stewards of our clients' capital. Integrating sustainability factors into our investment process allows us to make better-informed investment decisions and provides a more comprehensive view of each individual investment case. The UN Sustainable Development Goals outlined in Agenda 2030 provide an internationally recognized context for sustainability. The Sustainable Development Goals are highly relevant to international companies in that they outline a common development agenda towards 2030 and highlight key business risks and opportunities. All major areas of sustainable development are addressed; including issues from healthcare and water use to climate, nature, urban development, corruption and gender diversity. Regarding climate change, our ambition to become net-zero by 2050 is an important strategic framework for our investments.

We use our position as owners to influence companies to improve corporate behavior 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 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, and when this cannot be mitigated, we may divest. Engaging with companies happens on different levels, including management and board levels, and can take the form of direct dialogues and/or in collaboration with other investors. We have several focus areas for our engagements, trying to raise the standard both at a company and sector level. These include: Climate, Nature and Biodiversity, and Human Rights. We also engage with policymakers and regulators through initiatives such as Investors Policy Dialogue on Deforestation (IPDD) and Finance for Biodiversity (FfB) as we consider policy engagement to be a necessary complement to company engagement. We also try to move capital towards more sustainable companies while ensuring no harm to society and the environment. This is done through identifying and investing in Solutions companies. Solution companies are categorized by four major themes (climate, sustainable cities, circular economy and equal opportunities), and linked to one or several of the 17 SDGs.

In connection with our overarching principles and vision, the Storebrand Group has signed the Global Compact, follows the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We also support the UN Human Rights Conventions and ILO Core Conventions, the UN Environment Conventions, and the UN Convention Against Corruption. As part of our commitments, we have pledged to meet a significant set of goals in the composition of our investment portfolio, from the near term through to 2050. With regards to climate this includes reducing our portfolio emissions intensity by 32% by 2025, investing 15% of our AUM in solutions companies by 2025, net zero emissions by 2050, having 42% of our portfolio alignment with SBTi by 2027 and 100% by 2040. On Biodiversity we have a commitment to assess nature risk and set biodiversity targets by the end of 2024 and to eliminate commodity-driven deforestation by 2025. On human rights we have a goal of substantial alignment with UN Guiding Principles on Business and Human Rights across our portfolios by 2030 and that living wages are acknowledged in target sectors by 2030.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

We established the first sustainability team in at Storebrand in 1995, introduced minimum standards for all our investments in 2005 through the Storebrand Standard, our group-wide exclusion policy, and in 2010 integrated sustainability into all our funds through a proprietary ESG rating methodology. The Storebrand Group became a founding signatory of the Principles for Responsible Investment in 2006 and Storebrand Asset Management became a signatory in its own right in 2019. In 2020 we co-created the Investors Policy Dialogue on Deforestation involving 78 investors with more than \$10tn in assets. We have been at the vanguard of a movement that is now redefining the practice of investing. Sustainable investments used to be a space for NGOs and investors like us with strong commitments and long-term perspectives. We have experienced a growing commitment to sustainable investments over the past years and have also made significant progress during the last reporting year:

At the end of 2023, 13% of Storebrand's AUM was invested in solution companies, bringing us closer to our 2025 intermediary climate target of 15 %.

We overachieved our target of reducing carbon intensity of investments with 32% by 2025, reaching 50% reduction for listed equity and fixed income and 44% for real estate at the end of 2023.

In 2023, we voted at 1,999 company meetings, an increase from 1,348 in 2022. These 1999 company meetings represented 90,7% of our invested equity capital.

The Board of Directors of the Storebrand Group adopted updated policies for sustainable investments to reflect current practice and changes in internal governance. The following policies were created or adjusted in 2023:

1. Sustainable Investment Policy
2. Exclusion Policy
2. Human Rights Policy
3. Engagement and Voting Policy
4. Deforestation Policy

We also have a nature policy and a climate policy that were not updated in 2023.

Storebrand continued to engage with leading collaborative investor initiatives, and in 2023 joined initiatives like the Net Zero Engagement Initiative (NZEI), an expansion of the Climate Action 100+ initiative, to help investors align portfolios with the Paris Agreement goals.

As of year-end 2023, we had a total of 875 ongoing engagements with 728 companies. 80 per cent of our engagements with portfolio companies were conducted in collaborations and alliances with other stakeholders, up from 77 per cent in 2022. This reflects our strategy to join forces with other investors and stakeholders to maximise impact, where appropriate.

The CEO of Storebrand Asset Management, Jan Erik Saugestad, was in Q4 2023 elected a member of the board of the Institutional Investors Group on Climate Change (IIGCC). IIGCC is the leading European membership body driving the investment community towards a net zero and resilient future.

Storebrand engaged in dialogue with policy-makers on several social and environmental issues, including deforestation, deep sea mining, nature risk and human rights due diligence.

Storebrand ASA made the 2023 Climate Change A list of the which conducted a global analysis across 15,000 companies regarding their environmental disclosures. This highlights our performance on climate change and level of transparency.

In 2023, Storebrand continued its focus on resilient supply chains within the Platform for Living Wages Financials (PLWF) acting as co-chair for the Agri-food and Food retail working group to make an impact around supply chain resiliency and more particularly regarding living wages for workers and living income for farmers. Another focus area during 2023 was forced labour where a lot of our efforts went into engaging with companies in the textile, IT and energy sectors within the Investor Alliance for Human Rights.

During 2023, we also had a strong focus on conflict-affected and high-risk areas (CAHRA) engaging and excluding companies within the Energy, Agrifood, ITC, Utilities, Hospitality and Infrastructure sectors.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Commitments need to equate to action. The effects and continued support of our work may be limited if we cannot track progress. Our clients deserve transparency and clarity about how their capital is invested and what we achieve. For this reason, we believe the PRI reporting to document our progress against our commitments is crucial. And while we are proud of the progress we have made in delivering more sustainable investment, we are aware that there is still a way to go.

In the next two years, we will continue to prioritize engagements on various themes such as emissions reductions, biodiversity and nature, human rights, corporate sustainability disclosure and responsible policy engagement. We will have a stronger focus on engagement and transition, and seek to further influence companies in the right direction. Some specific examples in the next 2 years, include;

Continue our work to (over)achieve the Group's climate targets to reduce the carbon footprint in the Storebrand Group's total equities, corporate bond, and real estate investments by at least 32 percent by 2025 with the base year of 2018 and in line with the IPCC's 1.5°C scenarios, the commitments communicated through Storebrand's climate strategy and NZAOA.

Set new emissions reductions targets for 2030

Assess nature risk of our portfolios and set biodiversity targets by the end of 2024.

Carry out best efforts to eliminate commodity-driven deforestation by 2025, using tools like screening, voting, engagement and exclusion, as appropriate.

Continue engaging companies across our portfolios so they improve their human rights due diligence practices in alignment with the UN Guiding Principles to meet our target for 2030.

Continue our work within the Platform Living Wages Financials towards living wages and income within textile, agrifood and food retail sectors to meet our target for 2030.

Further develop our work on conflict-affected and high-risk areas by mobilising and collaborating with other investors for more leverage.

With the Norwegian Transparency Act having entered into force July 1st 2022, we will work to further calibrate the methodology for carrying human rights risk assessments, engage with companies on such issues and integrate social data in our financial decisions.

Prioritize how to better integrate our screening, engagement and reporting processes moving forward, as we recognize the importance of the availability and quality of data to better assess dependencies, risks and opportunities.

Begin pre-declaring our proxy votes 5 days ahead of company meetings in 2024.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Bård Bringedal

Position

Chief Investment Officer

Organisation's Name

Storebrand Asset Management

● A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

○ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2023

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- ☒ (A) Yes
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- ☒ (A) Yes
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.2	CORE	OO 2.1	N/A	PUBLIC	Subsidiary information	GENERAL

How many subsidiaries of your organisation are PRI signatories in their own rights?

- ☐ 1
- ☒ 2
- ☐ 3
- ☐ 4
- ☐ 5
- ☐ 6
- ☐ 7
- ☐ 8
- ☐ 9
- ☐ 10

List any subsidiaries of your organisation that are PRI signatories in their own right and indicate if the responsible investment activities of the listed subsidiaries will be reported in this submission.

		(1) Yes, the responsible investment activities of this subsidiary will be included in this report	(2) No, the responsible investment activities of this subsidiary will be included in their separate report
(A) Signatory name:	SKAGEN Funds	<input type="radio"/>	<input checked="" type="radio"/>
(B) Signatory name:	Cubera Private Equity	<input type="radio"/>	<input checked="" type="radio"/>

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only	US\$ 108,162,654,803.00
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(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]	US\$ 10,733,593,792.00
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(C) AUM subject to execution, advisory, custody, or research advisory only	US\$ 0.00
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Additional information on the exchange rate used: (Voluntary)

1 NOK= 0,0982 USD

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	49%	0%
(B) Fixed income	42%	0%
(C) Private equity	0%	0%
(D) Real estate	8%	0%
(E) Infrastructure	1%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity 80%

(B) Active – quantitative 10%

(C) Active – fundamental 10%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA 20%

(D) Active – corporate 70%

(E) Securitised 0%

(F) Private debt 10%

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail 28%

(B) Office 37%

(C) Industrial 5%

(D) Residential 20%

(E) Hotel 6%

(F) Lodging, leisure and recreation 0%

(G) Education 1%

(H) Technology or science 0%

(I) Healthcare 3%

(J) Mixed use 0%

(K) Other 0%

ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL

Provide a further breakdown of your internally managed infrastructure AUM.

(A) Data infrastructure 0%

(B) Diversified 7%

(C) Energy and water resources 0%

(D) Environmental services 0%

(E) Network utilities 22%

(F) Power generation (excl.
renewables) 0%

(G) Renewable power 41%

(H) Social infrastructure 0%

(I) Transport 30%

(J) Other 0%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(3) >10 to 20%
(B) Fixed income – SSA	(1) 0%
(C) Fixed income – corporate	(1) 0%
(E) Fixed income – private debt	(1) 0%
(G) Real estate	(1) 0%
(H) Infrastructure	(1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(6) Real estate	(7) Infrastructure
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active (11) >90 to <100%

(B) Listed equity - passive (11) >90 to <100%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(A) Listed equity - passive ☒ ☐

(B) Listed equity - active - quantitative ☒ ☐

(C) Listed equity - active - fundamental ☒ ☐

(E) Fixed income - SSA ☒ ☐

(F) Fixed income - corporate ☒ ☐

(H) Fixed income - private debt ☒ ☐

(J) Real estate



(K) Infrastructure



ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	65%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	10%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	25%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only 0%

(B) Negative screening only 100%

(C) A combination of screening approaches 0%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

(1) Fixed income - SSA

(2) Fixed income - corporate

(A) Screening alone 100% 0%

(B) Thematic alone 0% 0%

(C) Integration alone 0% 0%

(D) Screening and integration 0% 90%

(E) Thematic and integration 0% 0%

(F) Screening and thematic 0% 0%

(G) All three approaches combined	0%	10%
(H) None	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	100%	100%
(C) A combination of screening approaches	0%	0%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

☒ **(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

60%

- ☐ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- ☐ (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

60% of total AUM is marketed as article 8 and 9 funds, defined according to EU SFDR. 55% in article 8 funds and 5% in article 9 funds. Only article 9 funds are marketed as having sustainability as objective. For this calculation, it was necessary to make some simplifying assumptions. This number includes all AUM, including subsidiaries that are not otherwise covered by this report.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- **(B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications**

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

(A) Listed equity - passive

0%

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds

89%

(B) Social bonds

1%

(C) Sustainability bonds

8%

(D) Sustainability-linked bonds

2%

(E) SDG or SDG-linked bonds	0%
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(F) Other	0%
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(G) Bonds not labelled by the issuer	0%
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SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(A) Listed equity – passive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(B) Listed equity – active – quantitative	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) Fixed income – SSA	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) Fixed income – corporate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(H) Fixed income – private debt	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(J) Real estate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☒ (A) Publish as absolute numbers
- ☐ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☒ (E) Guidelines on sustainability outcomes
- ☐ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☒ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☒ (J) Stewardship: Guidelines on overall political engagement
- ☒ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☒ (L) Stewardship: Guidelines on (proxy) voting
- ☐ (M) Other responsible investment elements not listed here
 - ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☒ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☒ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☒ (C) Specific guidelines on other systematic sustainability issues

Specify:

We also have specific policies and guidelines for nature/biodiversity and deforestation.

- ☐ (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

☒ **(A) Overall approach to responsible investment**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/875cd09b-b01f-4b37-b72c-e023d858d379:a751f7bd8a177c90e2cd8a1bd9862ae679645a78/Sustainable%20Investment%20Policy.pdf

☒ **(B) Guidelines on environmental factors**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/b490c8d3-b8a8-4642-84bc-7686439d978b:6732fab29b23c226a80b1f117a10462748ff675b/2022-11-01-Storebrand-Policy-on-Nature.pdf

☒ **(C) Guidelines on social factors**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/1807bf8c-c190-4351-95fc-afd5e6741964:4f42bd2178a6982829cc10351a599a4c257a7939/Storebrand%20Human%20Rights%20Policy.pdf

☒ **(D) Guidelines on governance factors**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/875cd09b-b01f-4b37-b72c-e023d858d379:a751f7bd8a177c90e2cd8a1bd9862ae679645a78/Sustainable%20Investment%20Policy.pdf

☒ **(E) Guidelines on sustainability outcomes**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/875cd09b-b01f-4b37-b72c-e023d858d379:a751f7bd8a177c90e2cd8a1bd9862ae679645a78/Sustainable%20Investment%20Policy.pdf

☒ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/1ce30c35-ebbe-45bd-96a6-8e1aa25b4936:9f73b6f864f81af51ca8045668e4bc5f026a2674/2020-08-01-Storebrand-Climate-policy-for-investments.pdf

☒ **(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/1807bf8c-c190-4351-95fc-afd5e6741964:4f42bd2178a6982829cc10351a599a4c257a7939/Storebrand%20Human%20Rights%20Policy.pdf

☒ **(H) Specific guidelines on other systematic sustainability issues**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/b7e23f2b-7f71-4ff7-af9f-8df888a71325:496cfa4757f26231e3340941184aba4163f10ea7/Deforestation%20Policy.pdf

☒ **(J) Guidelines on exclusions**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_attachment/inline/c30490c1-7f33-4201-9214-ef831c5ed556:a68b9cb8bbda37898673b784848b23e59f1ee158/Storebrand-Exclusion%20Policy.pdf

☒ **(K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/875cd09b-b01f-4b37-b72c-e023d858d379:a751f7bd8a177c90e2cd8a1bd9862ae679645a78/Sustainable%20Investment%20Policy.pdf

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/8c929ddf-0a68-43b3-88ea-c5878be77e78:857a839d3c31ac49995eeb7f30cc08fcddec2cdcd/Engagement%20and%20Voting%20Policy.pdf

☒ **(M) Stewardship: Guidelines on overall political engagement**

Add link:

https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/3b98a337-51f8-45f5-b378-4d85e9aeb309:0f0ac57aa102b7ac264d4bb88e041a4b844a1097/2024-Storebrand-climate-and-sustainability-policy-engagement.pdf

☒ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/8c929ddf-0a68-43b3-88ea-c5878be77e78:857a839d3c31ac49995eeb7f30cc08fcddec2cdcd/Engagement%20and%20Voting%20Policy.pdf

☒ **(O) Stewardship: Guidelines on (proxy) voting**

Add link:

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/8c929ddf-0a68-43b3-88ea-c5878be77e78:857a839d3c31ac49995eeb7f30cc08fcddec2cdcd/Engagement%20and%20Voting%20Policy.pdf

- ☐ (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

☒ **(A) Yes**

Elaborate:

The following is written in Storebrand's Sustainable Investment Policy (page 3): "Our fiduciary responsibility is to manage our customers' portfolios with the best risk-adjusted returns long-term and we recognize the importance of addressing environmental, social and governance-related risks and opportunities to fulfil this responsibility."

- ☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

☒ **(A) Overall stewardship objectives**

☒ **(B) Prioritisation of specific ESG factors to be advanced via stewardship activities**

- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☒ (D) How different stewardship tools and activities are used across the organisation
- ☒ (E) Approach to escalation in stewardship
- ☒ (F) Approach to collaboration in stewardship
- ☒ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☒ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☒ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☒ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- ☐ (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- ☒ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

Add link(s):

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/8c929ddf-0a68-43b3-88ea-c5878be77e78:857a839d3c31ac49995eeb7f30cc08fcdcd/Engagement%20and%20Voting%20Policy.pdf

- ☐ (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- ☐ (C) We rely on the policy of our external service provider(s)
- ☐ (D) We do not have a policy to address (proxy) voting in our securities lending programme
- ☐ (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment
 (B) Guidelines on environmental factors
 (C) Guidelines on social factors
 (D) Guidelines on governance factors

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change
 (1) for all of our AUM

(B) Specific guidelines on human rights
 (1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues
 (1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ **(A) Listed equity**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(B) Fixed income**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(D) Real estate**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(E) Infrastructure**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%

- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

☒ **(A) Actively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

● (11) 100%

☒ **(B) Passively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

● (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☒ **(A) Board members, trustees, or equivalent**
- ☒ **(B) Senior executive-level staff, or equivalent**

Specify:

Top oversight lies at Storebrand Group ASA level. However, Storebrand Asset Management executive board also has oversight and accountability.

☒ **(C) Investment committee, or equivalent**

Specify:

We have some committees for certain processes such as the Investment Committee making final decisions on exclusions recommended by the Risk and Ownership team.

☒ **(D) Head of department, or equivalent**

Specify department:

The Heads of the equity and fixed income teams (CIOs) as well as the Head of the Risk and Ownership team also have oversight over responsible investments

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(I) Guidelines on managing conflicts of interest related to responsible investment	✓	✓
(J) Stewardship: Guidelines on engagement with investees	✓	✓
(K) Stewardship: Guidelines on overall political engagement	✓	✓
(L) Stewardship: Guidelines on engagement with other key stakeholders	✓	✓
(M) Stewardship: Guidelines on (proxy) voting	✓	✓
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

● (A) Yes

Describe how you do this:

From Storebrand's Capital and Sustainability Policy Engagement (2024):

SVP Public Affairs is responsible for the Storebrand Group's engagement with public policymakers and regulators, like the ministries of government and supervisory authorities, political parties, and members of parliament. Members of the Group's senior management regularly take part in dialogue with regulatory authorities and serve on the boards of industry organizations. Policy engagement priorities are regularly discussed and decided upon in the Group Risk Management Committee, to ensure oversight and accountability. This committee is headed by the Group CEO. These topics are also regularly on the agenda of the Risk Management Committee of the Group Board of Directors.

Storebrand's public policy engagement is focused on financial services regulations. We have regular meetings with the Norwegian Ministry of Finance, other ministries, and members of parliament on priority issues:

- Life and pension product and market regulations
- Competition in the market for public-sector occupational pensions

- Capital requirements for standard model banks

- Sustainable Finance regulation

Regarding climate, Storebrand has, among other things, advocated increased taxes on carbon emissions to incentivize the green transition, both in meetings with policy makers and media. Storebrand has also advocated economic incentives for businesses and the finance sector to incorporate nature into decision-making processes, such as aligning economic incentives with sustainable practices.

The Storebrand Group, and its subsidiaries in the group, are members of the following industry associations:

Storebrand Group

- Finance Norway (Finans Norge)

- The Confederation of Norwegian Enterprise (NHO), where Finance Norway became a member in 2023

Subsidiaries

SPP

- Insurance Sweden (Svensk Försäkring)

Storebrand Asset Management

- The Norwegian Fund and Asset Manager Association (VFF)

Skagen Fondene (a subsidiary of Storebrand Asset Management)

- The Norwegian Fund and Asset Manager Association (VFF)

Finance Norway and Insurance Sweden are members of Insurance Europe. Finance Norway is also a member of the European Banking Federation. Storebrand has members on the Board of Directors at Finance Norway, VFF and Insurance Sweden.

Oversight of these associations' policy engagement is achieved through representation on boards, permanent committees and working groups. In our assessment, the policy engagement of the industry associations is well aligned with Storebrand's policies and supports our goals related to sustainability and climate change.

Membership in other associations

Storebrand is also an active member of different initiatives that are engaging with public policymakers in the Nordic countries to incentivize the green transition, such as the Norwegian-based network for business Climate Leaders Skift and Nordic CEOs of a sustainable future.

Alignment of climate policy engagement with climate and sustainability commitments

Storebrand is represented on the board, on permanent committees and working groups in the industry associations we are members of. This enables us to contribute to their work on sustainability and climate change, and influence policy decisions. Discrepancies between the organizations' policies and our own have not been an issue so far. If discrepancies should occur, we will address them through the governing bodies of the organizations.

The Group's SVP Public Affairs and Chief Sustainability Officer will annually review both Storebrand's and the industry associations' policy positions and lobbying activities on sustainability and climate change. Measures will be taken if necessary to align with Storebrand's climate and environmental policies, if discrepancies occur. Measures can include:

- Changes in Storebrand's lobby positions and activities
- Voice concern and propose changes through representation on industry association's boards and committees
- Exit from industry associations in case of severe misalignment and lack of credible processes to improve alignment

We expect our investees to engage with policy makers in a responsible manner and establish a transparent process for monitoring and reviewing climate policy engagement and make this information public and available to investors

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☒ **(A) Internal role(s)**

Specify:

A large number of internal roles have responsibility for implementing our sustainable investment approach, including the CEO, CIO Equities, CIO Fixed Income, Head of Sustainable investments and Risk and Ownership team, Head of Solutions team; Portfolio managers.

☒ **(B) External investment managers, service providers, or other external partners or suppliers**

Specify:

Storebrand has contracted the services of ISS for proxy voting research and implementation, based on Storebrand's proxy voting policy and ISS Sustainability voting policy, and with oversight by Storebrand's Risk and Ownership team.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- **(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Explain why: (Voluntary)

Our senior executive-level staff in general do not have variable compensation linked to KPIs. However, integration of ESG in management is given special weight within our overall assessment for remuneration, where compliance with Storebrand's ESG standards and policies is the minimum level within all management areas. Furthermore, we place emphasis on the individual team and the individual employee's contribution to further development, in the form of improvements to Storebrand's standards, and in existing and new products.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☒ (A) Any changes in policies related to responsible investment
- ☒ (B) Any changes in governance or oversight related to responsible investment
- ☒ (C) Stewardship-related commitments
- ☒ (D) Progress towards stewardship-related commitments
- ☒ (E) Climate-related commitments
- ☒ (F) Progress towards climate-related commitments
- ☒ (G) Human rights-related commitments
- ☒ (H) Progress towards human rights-related commitments
- ☒ (I) Commitments to other systematic sustainability issues
- ☒ (J) Progress towards commitments on other systematic sustainability issues
- ☐ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☒ (A) Yes, including all governance-related recommended disclosures
- ☒ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☒ (D) Yes, including all applicable metrics and targets-related recommended disclosures

- ☐ (E) None of the above

Add link(s):

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

☒ **(A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)**

Link to example of public disclosures

https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/c33cad11-57ed-4379-81fe-352b647aa270:ba8278b5b87e1459afd319425f5504536c1ce86f/PAI-Statement-SAM-June-2023.pdf

☒ **(B) Disclosures against the European Union's Taxonomy**

Link to example of public disclosures

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

☐ **(C) Disclosures against the CFA's ESG Disclosures Standard**

☒ **(D) Disclosures against other international standards, frameworks or regulations**

Specify:

CDP Climate

Link to example of public disclosures

https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/78553cbb-9bf4-4333-84a7-bb039cd99177:fedb2f345173b4d2e74ee8a8d43f76a1967192bd/CDP-climate-change-report-2023.pdf

☒ **(E) Disclosures against other international standards, frameworks or regulations**

Specify:

GRI

Link to example of public disclosures

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

☒ **(F) Disclosures against other international standards, frameworks or regulations**

Specify:

Norwegian Transparency Act (Relevant for EU CSDDD)

Link to example of public disclosures

https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/1c4de07c-4518-4cd1-acf6-95d3cac70c33:c274200fc5cb3357afd5849a71ec77b9df1a356c/2023-storebrandkonsernets-redegj%C3%B8relse-etter-%C3%A5penhetsloven-juni.pdf

☐ **(G) Disclosures against other international standards, frameworks or regulations**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

☒ (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf
https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/8ed05967-baae-4447-9a11-78901f69eab9:36aea8b08f357124ec470e198e199422347c6361/Storebrand-climate-policy-engagement-2023.pdf

- ☐ (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- ☐ (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- ☒ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☒ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☒ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☒ (D) Exclusions based on our organisation's climate change commitments
- ☐ (E) Other elements
- ☐ (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- ☒ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- ☒ (1) for all of our AUM subject to strategic asset allocation
- ☐ (2) for a majority of our AUM subject to strategic asset allocation
- ☐ (3) for a minority of our AUM subject to strategic asset allocation

☒ (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- ☒ (1) for all of our AUM subject to strategic asset allocation
- ☐ (2) for a majority of our AUM subject to strategic asset allocation
- ☐ (3) for a minority of our AUM subject to strategic asset allocation

☒ (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- ☒ (1) for all of our AUM subject to strategic asset allocation
- ☐ (2) for a majority of our AUM subject to strategic asset allocation
- ☐ (3) for a minority of our AUM subject to strategic asset allocation

☒ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- ☒ (1) for all of our AUM subject to strategic asset allocation
- ☐ (2) for a majority of our AUM subject to strategic asset allocation
- ☐ (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

An important part of our approach is to systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change, into our investment decision-making processes. We take an integrated approach to sustainable investments, combining our sustainability strategy with our investment strategy. We believe that companies with an advanced level of skill in managing sustainability risks and opportunities have a competitive advantage that may enable them to deliver better returns, while contributing positively to sustainable development. All entities within Storebrand Asset Management operate in a framework that consists of a comprehensive set of exclusion criteria (norm-based and product-based), as well as principles that the entities must adhere to throughout their investment processes. Storebrand also integrates sustainability risk ratings into investment decisions to avoid or invest less in companies with high-risk sustainability rates and prioritize investment in companies with low sustainability risk.

All our portfolio managers are assigned a responsibility of taking ESG into account in their investment decisions – in fact, all employees in the Asset Management-arm of Storebrand have sustainability in their action plans, to varying degrees. In practice, this means that employees are continuously followed up on the following: 1) To further develop sustainability for commercialization and customer value creation 2) To concretize the use of ESG in the investment process 3) Integrate by documenting processes and updating materials used for e.g., reporting and customer meetings 4) Some managers also have explicit direction in their mandate to make active decisions for more sustainable investments, e.g., sustainability optimization, such as the managers of the PLUS funds, Global Solutions, etc

- ☐ (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- ☐ (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(4) Real estate	(5) Infrastructure
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

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. This engagement can be both direct individually and/or in collaboration with other investors. Both approaches can be very effective in addressing concerns regarding environmental, social and corporate governance (ESG) issues in order to reduce adverse sustainability impact. Combined, they can reinforce each other and be an effective signal to companies regarding our views on important ESG issues. Our engagement strategy emphasizes a positive impact (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. This also allows for more proactive engagement. The decision to engage with selected companies is made based on our assessment of the significance of a particular matter, the size of holdings, comparison of 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 largest investment exposure against salient climate, biodiversity or human rights risks inherent to these industries leading to the prioritization of engagements to mitigate these risks.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- ☒ (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- ☐ (B) We collaborate on a case-by-case basis
- ☐ (C) Other
- ☐ (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We engage 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. To increase our influence on and access to companies, we will almost always seek to collaborate with other investors, either through formal channels or through informal partnerships. Through our efforts in platforms, including the Climate Action 100+, Nature Action 100, FAIRR, IIGCC, FSDA, IPDD, PLWF, PRI Advance and the Investor Alliance for Human Rights, among others, we have collaborated with other investors on several issues to exert a positive influence on companies, and we have seen some very good results from this work. A few examples of our collaborative engagement efforts during 2023 include:

- The Climate Action 100+, an investor-led initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change. 171 focus companies have been selected for engagement, including the Norwegian company Equinor for which Storebrand has the CA100+ lead investor.
- Nature Action 100+, a group of institutional investors, including Storebrand Asset Management, announced the formation of Nature Action 100 at CBD COP 15, a new global engagement initiative which focuses on investors driving urgent action on the nature-related risks and dependencies in the companies they own. Nature Action 100 aims to drive greater corporate ambition and action on tackling nature loss and biodiversity decline and will complement the United Nations Convention on Biological Diversity's Global Biodiversity Framework by identifying the private sector actions that need to be undertaken to protect and restore nature and seek to catalyze these actions via investor-company engagements.
- The Investor Initiative on Hazardous Chemicals (IIHC), started by Storebrand together with Aviva Investors, to tackle the chemical sector's approach to the risks of hazardous chemicals. By the end of 2022, IIHC included than 50 asset managers with US\$ 11 trillion in assets under management.
- Platform Living Wages Financials (PLWF), where Storebrand has been a member of since 2021. This alliance of 19 financial institutions with over €6.5 trillion of AUM collectively engages investee companies on living wages. During 2022 Storebrand worked closely with companies in our portfolios within the garment & footwear, food & agriculture, and retail sectors, to assess their current state of development in living wages, and participated in the PLWF annual conference to share learnings and get further input directly from worker organizations and other organizations involved in the field.
- Institutional Investor Group on Climate Change (IGCC) is collaborative initiative aimed at ensuring that banks carry out their critical role in driving capital flows towards supporting the global transition to a 1.5°C decarbonisation pathway, Storebrand participates in the working group on banks which engages collaboratively with 27 global banks to accelerate progress towards a net zero economy.
- Sustainable seafood engagements. Storebrand is a signatory of the Sustainable Blue Economy Finance Principles (SBE) and participates in UNEP FI's finance sector working group on seafood. The group has created guidance for how financial institutions can contribute to a sustainability in the seafood sector, including activities to support, promote and avoid. Storebrand also participated in collaborative engagement with aquaculture companies, coordinated by FAIRR.
- Investor Alliance for Human Rights. Storebrand is a member of the Investor Alliance for Human Rights. The alliance focuses on the investor responsibility to respect human rights and thus facilitates investor corporate engagement that drive responsible business conduct and standard-setting activities that push for robust business and human rights standards. The Alliance is comprised of over 200 institutional investors, including asset management firms, trade union funds, public pension funds and foundations representing a total of over US\$12 trillion in assets under management and 19 countries. Over the years, Storebrand has been involved in different working groups and initiatives within the alliance. In 2022, we were mainly involved in three initiatives: one on working conditions in supply chains with a strong focus on forced labour within the textile, ICT and energy sectors; an initiative on digital rights engaging with the Information and Communication Technologies sectors as well as one on conflict-affected and high-risk areas (CAHRAs) with a cross sectorial approach.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

☒ **(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**

Select from the list:

- ☒ **1**
- ☐ 4
- ☐ 5

☐ (B) External investment managers, third-party operators and/or external property managers, if applicable

☐ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

☒ **(D) Informal or unstructured collaborations with investors or other entities**

Select from the list:

- ☒ **3**
- ☐ 4
- ☐ 5

☒ **(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**

Select from the list:

- ☒ **2**
- ☐ 4
- ☐ 5

☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

An important part of our approach is to systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change, into our investment decision-making processes. We take an integrated approach to sustainable investments, combining our sustainability strategy with our investment strategy. We believe that companies with an advanced level of skill in managing sustainability risks and opportunities have a competitive advantage that may enable them to deliver better returns, while contributing positively to sustainable development. All entities within Storebrand Asset Management operate in a framework that consists of a comprehensive set of exclusion criteria (norm-based and product-based), as well as principles that the entities must adhere to throughout their investment processes. Storebrand also integrates sustainability risk ratings into investment decisions to avoid or invest less in companies with high-risk sustainability rates and prioritize investment in companies with low sustainability risk. Storebrand measures material ESG risk, or the risk of causing adverse sustainability impact, through an ESG Risk Rating. We measure a company's ESG risk by: • Corporate governance: Applies to all companies irrespective of the sub-industry they represent. Reflects the conviction that poor corporate governance poses material risks for companies. • Material ESG issues: Assessment of material ESG issues occurs at the sub-industry level. Issues are examined based on the typical business model and business environment a company is operating in. • Idiosyncratic ESG issues: Unexpected and unrelated to the specific sub-industry and the business models that can be found in that sub-industry. Based on identified risks, Storebrand's Risk and Ownership team considers how to reduce our vulnerability to these risks, through engagement with companies, and where appropriate, a structured escalation of the engagement process. More information on this is available in this section, within our description of active ownership and exclusion. Risk is inherent in many industries. Therefore, in addition to assessing risks, we also further assess each company's ability to manage them. We assign an ESG risk score to all companies we invest in. That ESG risk score is available for our portfolio managers to integrate in investment decisions. Our Risk and Ownership team also uses the ESG risk score when identifying and prioritizing thematic adverse impacts for specific industries, and when engaging with individual companies to identify needs for sustainability improvements.

All our portfolio managers are assigned a responsibility of taking ESG into account in their investment decisions – in fact, all employees in the Asset Management-arm of Storebrand have sustainability in their action plans, to varying degrees. In practice, this means that employees are continuously followed up on the following: 1) To further develop sustainability for commercialization and customer value creation 2) To concretize the use of ESG in the investment process 3) Integrate by documenting processes and updating materials used for e.g., reporting and customer meetings 4) Some managers also have explicit direction in their mandate to make active decisions for more sustainable investments, e.g., sustainability optimization, such as the managers of the PLUS funds, Global Solutions, etc

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Storebrand believes in exercising our rights as shareholders. We employ three main ways of doing this:

- voting and filing resolutions at shareholder meetings
- engagement directly with a company, individually or collaboratively, by expressing our views, in writing or through dialogue with the company's management, advisers or Board of directors

- engagement with other stakeholders, including policy makers, regarding issues of systemic and material importance to our investments

Our Risk and Ownership team is responsible for setting the framework and principles for active ownership and commitment. The team prioritizes the themes that are particularly relevant for engagement each year (as described below), and with special focus on where proactive involvement is needed. The team receives information about potential cases of interest, primarily from data suppliers, but may also take up cases for analysis based on issues that are noticed in the media, by customers or by other areas and teams within the company, such as managers, communications staff, client relationship managers and so on.

Further to the Risk and Ownership team stewardship may also be exercised by fund managers and the Investment Committee:

- Fund managers: managers may choose to open a dialogue with companies based on the decided corporate governance principles.
- Sustainable Investment Committee: meets once a quarter to decide about norm-based exclusions and whether companies should be included on Storebrand's observation list, excluded or reintroduced to the investment universe are made here. While the focus of such meetings is exclusion decisions, companies that are placed on the observation list require engagement and the committee may sometimes assess whether active ownership has not yielded the desired result.

Engagement process: The decision to engage with companies is based on our assessment of the significance of a particular matter, holding size, scope to effect change and opportunities to collaborate with other investors.

Documenting engagement objectives and outcomes: Before we start an engagement, we establish specific goals for the engagement process, to ensure clear communication with the investees and to facilitate the measurement of the engagement's success. Engagement can be reactive (based on controversies or potential breaches of our standards) or proactive in nature, in which we engage with companies or a sector to address more systemic issues. We have a web-based system for registering, monitoring and disclosing on engagement activities and progress, and we have developed an open version (without company names or identifiers) that allow clients and other interested parties to track our engagements in real time.

ESG analysts in our Risk and Ownership team record the success factor for the commitment in each engagement process. We rank engagement success on a scale of four possible levels, with fourth and highest level in line with the UN Principles for Responsible Investment, PRI: Improved Business Practices (in line with the PRI definition of success: "The actions taken were fully or mostly completed after Storebrand contacted the company").

The progress of engagement is discussed regularly by the Risk and Ownership Team, including minimum requirements, alternative methods of achieving or improving dialogue, and whether an engagement should be escalated or not. If the company does not meet our minimum requirements (or communicates a plan and ambition to start measures) after repeated dialogue attempts, we escalate our actions.

Escalation can mean 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 done so
- proposing, submitting or co-filing resolutions at the AGM
- voting against re-election of board members concerned

- setting a company on our observation list

Engagement with other stakeholders: Across all our assets and all geographies, 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 other stakeholders, such as policy makers, governments, industry organizations, environmental and human rights organizations or labour unions. In particular, we consider policy level engagement an important factor in stimulating change since we believe regulation sometimes is required to advance many sustainability issues.

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 Storebrand's data needs and encourage improvements.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

☒ **(A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes**

Select from the below list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear**

Select from the below list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases
- ☐ (D) We do not review external service providers' voting recommendations
- ☐ (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- ☐ (A) We recall all securities for voting on all ballot items
- ☒ **(B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting**

Provide details on these criteria:

The Company allows securities lending for the funds' shares but will normally recall the shares before general meetings to be able to vote with at least 50% percent of the Company's shares at the general meeting. If securities lending is deemed more beneficial for unit holders, or do not have any material impact on shareholder engagement, then after an individual assessment, recall before general meetings might not occur. Securities lending must not result in any material negative impact on the sustainability focus of the Company's funds.

- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☒ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- (A) Yes, for all (proxy) votes
Add link(s):
<https://vds.issgovernance.com/vds/#/MTAzNjM=/>
- (B) Yes, for the majority of (proxy) votes

- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(1) for all votes	(1) for all votes
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(3) for a minority of votes
(C) We did not publicly or privately communicate the rationale, or we did not track this information	○	○
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	○	○

(A) Yes, we publicly disclosed the rationale - Add link(s):

<https://vds.issgovernance.com/vds/#/MTAzNjM=/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Storebrand uses ISS Proxy Voting Services for voting, and we receive notifications 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.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity

(A) Joining or broadening an existing collaborative engagement or creating a new one



(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal



(C) Publicly engaging the entity, e.g. signing an open letter



(D) Voting against the re-election of one or more board directors



(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director



(F) Divesting



(G) Litigation



(H) Other ☐

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings ☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☒ (A) Joining or broadening an existing collaborative engagement or creating a new one
- ☒ (B) Publicly engaging the entity, e.g. signing an open letter
- ☒ (C) Not investing
- ☒ (D) Reducing exposure to the investee entity
- ☒ (E) Divesting
- ☐ (F) Litigation
- ☐ (G) Other
- ☐ (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☒ (A) Yes, we engaged with policy makers directly
- ☒ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- ☐ (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☒ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☐ (C) We provided technical input via government- or regulator-backed working groups
- ☒ (D) We engaged policy makers on our own initiative

Describe:

Storebrand established and co-chair the collaborative engagement on deforestation called Investor Policy Dialogue on Deforestation where we engage with policy makers in selected countries such as Brazil, Indonesia and consumer countries (EU, UK and China). Through this initiative we have been engaging with various government stakeholder representatives, through a series of meetings as well as sending letters. For more information about the initiative, see here: <https://www.tropicalforestalliance.org/en/collective-action-agenda/finance/investors-policy-dialogue-on-deforestation-ipdd-initiative/>

Storebrand is also co-chairing the Public Policy WG under FfB where we have been engaging with policy makers. An example is in the run up to COP 15. We developed position papers to ensure that the Global Biodiversity Framework had strong reference to alignment of financial flows and disclosure requirements, which was adopted by policymakers as the Kunming- Montreal Framework.

An example of signing public letters was an investor letter seeking the establishment of a 'Business, Human Rights and Environment Act' - an ambitious UK primary legislation to mandate companies to carry out human rights and environmental due diligence across their own operations and value chains.

- ☐ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☒ (A) We publicly disclosed all our policy positions

Add link(s):

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf
https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/3b98a337-51f8-45f5-b378-4d85e9aeb309:0f0ac57aa102b7ac264d4bb88e041a4b844a1097/2024-Storebrand-climate-and-sustainability-policy-engagement.pdf

- ☒ (B) We publicly disclosed details of our engagements with policy makers

Add link(s):

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf
https://www.tropicalforealliance.org/assets/IPDD/Final_IPDD-Deforestation-Report.pdf
https://www.storebrand.no/en/sustainability/sustainability-library/_/attachment/inline/3b98a337-51f8-45f5-b378-4d85e9aeb309:0f0ac57aa102b7ac264d4bb88e041a4b844a1097/2024-Storebrand-climate-and-sustainability-policy-engagement.pdf

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Engagement with top emitters

(1) Led by

● **(1) Internally led**

- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

☑ **(1) Environmental factors**

☐ (2) Social factors

☐ (3) Governance factors

(3) Asset class(es)

☑ **(1) Listed equity**

☑ **(2) Fixed income**

☐ (3) Private equity

☐ (4) Real estate

☐ (5) Infrastructure

☐ (6) Hedge funds

☐ (7) Forestry

☐ (8) Farmland

☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

A structured dialogue between JFE Holdings ("JFE"), one of Japan's leading steelmakers, and a group of shareholders

including Storebrand Asset Management, has this May resulted in the company announcing enhanced climate commitments.

The shareholder group has been collectively engaged with JFE Holdings since January 2022. As a result of the dialogue, the company announced the following measures designed to enhance its climate governance structure and promote ongoing conversation with shareholders about its decarbonisation plans:

- A commitment to an annual consideration of its emissions reduction target, with a focus on exceeding its 30% target
- An annual conversation with shareholders about the alignment of its technology investment with its target
- A commitment to link executive remuneration with its target in the company's medium term business plan

(B) Example 2:

Title of stewardship activity:

Engagement with policymakers to halt deforestation

- (1) Led by
- ☒ (1) Internally led
 - ☐ (2) External service provider led
 - ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- ☒ (1) Environmental factors
 - ☐ (2) Social factors
 - ☐ (3) Governance factors
- (3) Asset class(es)
- ☒ (1) Listed equity
 - ☒ (2) Fixed income
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☐ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

As co-chair of the Investor Policy Dialogue on Deforestation, Storebrand has engaged with the EU with the aim to strengthen the upcoming legislation to reduce global deforestation. We have urged the policymakers to take a broad approach to defining deforestation so that legislation should include other carbon-rich and biodiverse habitats and legislation should include a broad range of commodities to avoid spill over impacts. In addition, we also advocated for the legislation to put due diligence obligations on banks and investors that finance large commodity producers and buyers.

The new EU regulation on deforestation-free products (EUDR) is a welcome and significant step in the efforts to eliminate deforestation. The law will introduce mandatory due diligence for operators and traders placing (or exporting) a specific set of forest-risk commodities on the EU market demonstrating that these have been produced legally and on land not deforested after the end of 2020. The scope of commodities initially includes a broad range of commodities: soy, cattle, palm oil, wood, coffee, cocoa and rubber as mainly raw commodities with some exceptions such as leather, chocolate and printed paper. Despite its groundbreaking nature, other threatened ecosystems not covered by the legislation or does not put due diligence obligations on banks and investors that finance large commodity producers and buyers.

(C) Example 3:
Title of stewardship activity:

Ensure an ambitious Global Biodiversity Framework at COP 15

- (1) Led by
- ☒ (1) Internally led
 - ☐ (2) External service provider led
 - ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- ☒ (1) Environmental factors
 - ☐ (2) Social factors
 - ☐ (3) Governance factors
- (3) Asset class(es)
- ☒ (1) Listed equity
 - ☒ (2) Fixed income
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☐ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Storebrand is co-chairing the public policy advocacy working group under Finance for Biodiversity. Over the past years, in the run up to COP 15, we have provided input to the negotiation process. For the first time in history, the finance sector had an official observer status under CBD meaning we could read statements and react to the negotiations.

The initial draft did not make any references to private financial flows. We have in our engagement with policymakers over the past years argued that 1) there needs to be an overall goal to ensure alignment of financial flows and 2) that this alignment requires disclosure by large companies.

The final text was positively aligned with the language proposed by our working group. There is now a strong goal D in the GBF, emphasizing alignment of financial flows (both public and private) with the goals and targets in the GBF and a strong target 15 which require governments to ensure that large companies disclose their risks, impacts and dependencies on nature.

(D) Example 4:

Title of stewardship activity:

Platform Living Wages Financials. Engagement with Agri-food sector.

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☒ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☒ (1) Listed equity
- ☒ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Storebrand is co-chairing the Working Group covering the Agri-food and retail sectors in addition to being lead investor for some of the companies engaged and assessed on living wages and income.

For example, as lead investor for Orkla, we assessed:

- If living wages were integrated in the company's policies as well as in their requirements to their suppliers,
- to what extent the company engaged with stakeholders on the topic of living wages and/or living income;
- how did the company identify, assess and managed living wages/income at own operations and in its supply chain
- How the company aligned its procurement practice to allow improvements in farm-level income

- If the company had in place appropriate grievance mechanism enabling effective remedy

Considering that the company was newly being identified for engagement by the platform, Storebrand focused on creating awareness about the relevance of living wages and living income and the integration of this topic in their business processes.

Outcomes: The company identified in their annual report the topic of living wages as salient issue. It also integrated in an updated human right policy a description covering all the elements of what a living wage entails as well as a reference to methodology they are using to calculate living wages, so far, at their subsidiaries. These first steps made the company already ranked at the second lowest category for the agrifood sector. For a topic that shows slow progress is a good start.

Although these are steps on the right direction, the company still has not reached living wages at its own subsidiaries and lacks effective processes to achieve living incomes in its

supply chain.

Therefore, we will continue to engage with the company now also supported by new Norwegian human rights due diligence regulation requiring companies to report on how they manage and mitigate living wages at core operations as well as in the supply chain as part of their decent working conditions due diligence.

(E) Example 5:

Title of stewardship activity:

Investor Alliance for Human Rights-Forced labour in the solar sector

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☒ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☒ (1) Listed equity
- ☒ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

As a member of the Investor Alliance for Human Rights, Storebrand has participated actively in a working group for labour

rights and in particular forced labour in the textile, IT and

energy industries. Following reports of forced labour in the

Chinese solar industry, part of our focus in 2022 was directed

to improving labour rights in the solar industry value chain,

particularly in Xinjiang in the Uyghur region.

we have called on the companies to conduct human rights due diligence in their supply chains, thereby encouraging them to identify, assess, avoid and mitigate risks of human rights violations by implementing policies and practices in areas such as traceability and risk assessment as well as procurement practices.

In 2021, we carried out a risk-based sale of assets in two

companies with operations in Xinjiang while flagging 10 companies to avoid investing in (pre-investment screening) as they were linked to forced labour abuses in Xinjiang.

Among the factors considered in these assessments are

the following:

- Actual link of company operations to forced labour and the

forced labour programs

- Role in the supply chain (proximity to the actual violations:

raw materials/polysilicon manufacturer/ingots/module manufacturer or clear tainted Supply Chain)

- Geographic operations (proximity to the actual violations/

operations in Xinjiang)

- Company's links to Chinese authorities. (partnerships/ownership/projects/political ties)

- Company's size, percentage of the market (in Xinjiang/China/

World)

- Company's sourcing (Xinjiang, China or other countries)

- Company on US Government list (Withhold release orders or

entity list)

- Likelihood to come into a dialogue, and have impact on

company business practices

The same in-depth analysis of working conditions in the solar

industry value chain, resulted in a subsequent dialogue with

Canadian Solar regarding its operations in China among many

other companies in the sector. The dialogue was led by SHARE,

with Storebrand as an actively supporting investor directly participating in the calls with the company and in the engagement strategy, within the platform of the Investor Alliance for Human Rights.

The investor group within the Alliance has been calling on companies to conduct human rights due diligence in their supply chains, encouraging them to identify, assess, avoid and mitigate risks of human rights violations by implementing policies and practices in areas such as traceability, risk assessment and procurement.

As Canadian Solar failed to meet shareholders' requests to conduct a human rights assessment of its supply chain in general and its operations in Xinjiang, Storebrand decided in 2022 to co-file together with SHARE a shareholder resolution requesting that shareholders vote on the issue.

Canadian Solar blocked the proposal at its 2022 Annual General Meeting. Following continued dialogue with Storebrand, however, the company noted the following in its Sustainability Report published in August 2022:

"...In May 2022, our Board passed a resolution mandating a third-party assessment, at reasonable cost, on the extent to which

Canadian Solar's policies and procedures effectively protect against forced labour in its operations, supply chains, and business relationships. The assessment will draw upon international standards such as the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and ILO Forced Labour Convention, 1930 (No. 29). We have initiated our efforts to search for a reputable, international auditing firm to conduct this assessment at reasonable cost and expect to report

back to the Board on the results of the audit in due course..."

Storebrand continues engaging with Canadian Solar to follow up on their commitment to conduct a third-party assessment of its supply chain. However, we are aware, as we also engage with other companies involved in the solar energy supply chain in China, that this can be a difficult task. It can be difficult to determine whether third-party assessments or verifications of human rights violations are reliable, or whether such processes entail risks for third parties involved. As a result, it is also difficult to document violations, or links to companies in this region.

Regardless, we will continue to look for ways to exercise influence asking the company to manage and mitigate to the extent possible. .

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☒ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Climate risk is an integrated part of the Group's enterprise risk identification, assessment and management processes, which is continuously monitored by the board, management and through each of our departments in Storebrand. The process is used to determine which climate-related risks and opportunities could potentially have a substantive financial or strategic impact on the organization. Storebrand assesses climate risk in the same framework as other business risks. The overall risk, including climate risk, is summarized in the Risk Review in the Group Executive Management and the Board twice a year. Climate risk is also assessed in the annual ORSA (Own Risk and Solvency) report which is adopted by the Board of Directors and submitted to the Financial Supervisory Authority of Norway. We track and assess exposure to sectors with significant climate and sustainability risks. We conduct physical climate risk assessments for our property portfolio on a property level.

Storebrand's largest climate-related financial risks and opportunities are considered to be in the transition to a low-emission society. Our investments may be affected by climate policy and regulations (current and emerging), technology, legal risk and changes in market preferences. In addition, reputational and acute physical risks are always included as a part of our interdisciplinary climate-related risk process and are continuously monitored in our operational risks. Transitional risk was mapped through exposure to high and low carbon technologies in the most important sectors, including fossil fuels and electrification in the transport sector. The results indicate how our investments are influenced by different scenarios, compared to reference portfolios.

☒ (B) Yes, beyond our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Our commitment through the Net Zero Asset Owner Alliance and Net Zero Asset Manager Initiative is for our entire investment portfolio to be net zero by 2050. Our Science Based Targets also have a target year of 2050. For our property portfolio, life expectancy of buildings is minimum 60 years. We are a long term owner and investor. Physical climate change can have major consequences for economic growth and thus expected returns in the financial market. This will also affect Storebrand's investments, and the consequences are greatest in the Current policy scenario. To quantify the risk associated with physical climate change, Storebrand has defined a stress test that includes equities, bonds and real estate, based on a decline of 20 per cent, 10 per cent and 2 per cent, respectively.

Physical climate change and associated market consequences are very long-term. In practice, the consequences will probably be somewhat lower returns over many years, rather than as an immediate decline in value. But the financial market is pricing in all new information. An immediate stress test can therefore make sense, even if actual consequences occur far in the future.

Physical climate change, assuming that the current policy is continued, is also expected to have major consequences for the funds Storebrand owns, and the stress test shows an overall decline in value of approximately 8-10 per cent.

Both the carbon footprint and exposure to industries or technologies provide a snapshot of risks. We believe it is more important to look at how companies work towards reducing the footprint in line with the zero-emission target. Storebrand assesses, among other things, whether companies we plan to invest in have committed to emission targets based on scientific facts. We also closely monitor the proportion of companies in our portfolios that have set science based targets.

- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

● **(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities**

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

This is also described in PGS 41 in detail.

Climate-related risks and opportunities have affected our investment strategy and reflected in our overall climate policy where we have divested from various activities, practices and/or sectors which we consider high climate risk. In addition, the management have adopted several climate related targets which is reflected in investment strategies across the company. The most relevant climate-related targets can be found below:

- Net-zero commitment: We made a commitment to achieve net zero greenhouse gas emissions across all our assets under management by 2050, at the latest. Our long-term ambition is backed up by short-term strategies and we have set 1) sub-portfolio target (32% reduction in GHG by 2025), 2) financing target (15% of total AUM in solutions by 2025) and 3) engagement target (engagement with top emitters to make a change in the real economy).

- Science based targets: To ensure a science-based approach, Storebrand Asset Management has also made a commitment to 42% of its listed equity and corporate bond portfolio by invested value setting SBTi validated targets by 2027.

- Deforestation commitment: Global deforestation accounts for nearly 20 per cent of all CO2 emissions and deforestation driven by commodities such as palm oil, soy, cattle and timber is

a major source of emissions in this sector. Storebrand also made a commitment to eliminate commodity driven deforestation from its portfolios by 2025. By using a combination of self-reported data and satellite images, we have identified companies and banks at risk and developed a targeted approach to mitigate these risks.

- Nature commitment: Storebrand launched a nature policy in 2022 and accounts for nature-related dependencies, risks and opportunities in our financial decision-making. We see both challenges (climate and nature) deeply connected, and work to ensure that the strategies to tackle climate change are compatible with supporting biodiversity, and vice versa.

○ (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

☑ **(A) Coal**

Describe your strategy:

Since 2020, with the adoption of the climate policy, Storebrand has not been invested in companies that derive more than 5% of its revenues from coal.

☒ **(B) Gas**

Describe your strategy:

Storebrand has since 2013 developed a low carbon investment strategy, the Storebrand Plus Funds. This strategy aims to create a broadly diversified, low tracking error fund category which is pre-positioned for the implementation of the Paris Agreement. Storebrand Plus Funds low carbon investment strategy is achieved using a multi-pronged approach. First, fossil fuel companies – defined as those whose revenues from fossil-related activities exceed 5% of total revenue – are excluded from the Storebrand Plus Funds investment universe. Furthermore, the funds take steps to ensure they are consistent with a fossil-free philosophy, which includes removing companies with large fossil reserves. The Storebrand Plus Funds then tilt investments towards high ESG and low carbon footprint scoring companies. The low carbon funds send important market signals on the increasing interest in using financial vehicles as a tool to shift capital towards more carbon-efficient companies, and a low-carbon economy.

For the remaining investments, we follow the expectations for oil and gas under NZAOA.

☒ **(C) Oil**

Describe your strategy:

Storebrand has since 2013 developed a low carbon investment strategy, the Storebrand Plus Funds. This strategy aims to create a broadly diversified, low tracking error fund category which is pre-positioned for the implementation of the Paris Agreement. Storebrand Plus Funds low carbon investment strategy is achieved using a multi-pronged approach. First, fossil fuel companies – defined as those whose revenues from fossil-related activities exceed 5% of total revenue – are excluded from the Storebrand Plus Funds investment universe. Furthermore, the funds take steps to ensure they are consistent with a fossil-free philosophy, which includes removing companies with large fossil reserves. The Storebrand Plus Funds then tilt investments towards high ESG and low carbon footprint scoring companies. The low carbon funds send important market signals on the increasing interest in using financial vehicles as a tool to shift capital towards more carbon-efficient companies, and a low-carbon economy.

For the remaining investments, we follow the expectations for oil and gas under NZAOA.

☒ **(D) Utilities**

Describe your strategy:

Storebrand has since 2013 developed a low carbon investment strategy, the Storebrand Plus Funds. This strategy aims to create a broadly diversified, low tracking error fund category which is pre-positioned for the implementation of the Paris Agreement. Storebrand Plus Funds low carbon investment strategy is achieved using a multi-pronged approach. First, fossil fuel companies – defined as those whose revenues from fossil-related activities exceed 5% of total revenue – are excluded from the Storebrand Plus Funds investment universe. Furthermore, the funds take steps to ensure they are consistent with a fossil-free philosophy, which includes removing companies with large fossil reserves. The Storebrand Plus Funds then tilt investments towards high ESG and low carbon footprint scoring companies. The low carbon funds send important market signals on the increasing interest in using financial vehicles as a tool to shift capital towards more carbon-efficient companies, and a low-carbon economy.

For the remaining investments, we follow the expectations for oil and gas under NZAOA.

☒ **(E) Cement**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

☒ **(F) Steel**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

☐ **(G) Aviation**

☐ **(H) Heavy duty road**

☐ **(I) Light duty road**

☒ **(J) Shipping**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

☒ **(K) Aluminium**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

☒ **(L) Agriculture, forestry, fishery**

Describe your strategy:

Storebrand adopted a deforestation policy in 2019 and our ambition is to eliminate commodity driven deforestation from our portfolios by 2025. As part of this commitment we screen our portfolios annually and identify companies at risk. We have companies on our exclusion and observation list due to severe environmental damage and engage with the rest either individually or through collaborative networks such as FSDA.

☒ **(M) Chemicals**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

Storebrand has targeted over 50 companies using the analysis by Chemscore, which examined the largest chemical producers. We expect these companies to disclose the volume of all hazardous chemicals they produce, phase out and substitute persistent chemicals and demonstrate action to improve their chemicals management by raising their ChemScore rankings.

☐ **(N) Construction and buildings**

☒ **(O) Textile and leather**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in the textile sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, IIGCC and other relevant investor platforms.

Leather is addressed as part of our engagement on deforestation, including company engagement through Finance Sector deforestation Action and the Investor Working Group for a deforestation-free Automotive sector, and policy engagement through the Investor Policy Dialogue on Deforestation.

☒ **(P) Water**

Describe your strategy:

As part of our climate strategy and dialogue with high emitting investees, we have also engaged with companies in this sector. The expectations for these companies are guided by our climate policy under section "high emitting sectors" and investor expectation under CC100+, NZEI and other relevant investor platforms.

☐ **(Q) Other**

- ☐ **(R) We do not have a strategy addressing high-emitting sectors**

Provide a link(s) to your strategy(ies), if available

<https://www.storebrand.com/sam/no/asset-management/sustainability/policies-and-governance/climate-policy>
https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/b7e23f2b-7f71-4ff7-af9f-8df888a71325:496cfa4757f26231e3340941184aba4163f10ea7/Deforestation%20Policy.pdf
https://www.storebrand.com/sam/no/asset-management/insights/document-library/_/attachment/inline/7b67a87c-6413-494b-a2fe-d98427bcd0e:bf5e90815c1f356c2f057bb16e6c161e73b30734/Oil-and-gas-position-paper.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☒ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☒ (D) Yes, using other scenarios

Specify:

Storebrand uses scenarios developed by the Network for Greening the Financial System (NGFS). The network has been established by central banks and supervisory authorities to establish a framework for assessing and handling of climate risk, as well as to encourage the financial sector to support the transition to a low-carbon economy.

In addition, our short term climate target (emission reduction target) is based on IEA scenarios.

- ☐ (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- ☒ (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

In line with the recommendations from Task Force on Climate-related Financial Disclosures (TCFD), Storebrand Asset Management has established a governance structure for its climate policy to ensure climate change is part of group Management's governance duties in the same way as any other issue prioritized at management level. Storebrand's climate policy will be overseen by Group Management. Responsibility for implementation and assessment of climate risk and opportunities lies with portfolio managers and sustainability teams. They will report regularly on climate specific indicators, and will explain how the company is managing the investment-related risks and opportunities associated with these indicators.

The following has been reported to the board twice since 2021:

- Progress on reduced emissions, based on the short-term targets that the company has set
- Progress on investments in capital flows towards low-carbon, climate-resilient and transition companies
- Progress on engagement with sectors with high climate risks and that contribute heavily to climate change
- Any other relevant issue related to climate risk (progress on work related to nature)

(2) Describe how this process is integrated into your overall risk management

Storebrand assesses climate risk based on the same framework as other business risks. Overall risks, including climate risk, are described in a risk analysis report addressed by the Group Executive Management and Board twice a year. The risk analysis includes assessments of business and reputation risks related Storebrand'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.

- ☒ (B) Yes, we have a process to manage climate-related risks

(1) Describe your process

Storebrand has established a taskforce led by both CIOs (equity and fixed income) to support the implementation of climate and nature commitments as outlined in our policies. The taskforce meets every second week with the aim to integrate climate and nature related risks and opportunities in investment decisions. The taskforce reports back to the board twice annually on progress made.

(2) Describe how this process is integrated into your overall risk management

The results of scenario analysis together with exposure analysis have been used to inform asset allocation and stewardship. For example, after considering the future trajectories for climate change, we have decided to mitigate risk by:

- setting carbon intensity reduction target for investments (32% by 2025)
- divest from holdings that have higher emissions profiles (coal, oil sand, deforestation-linked commodities),
- increase investments in climate solutions (15% of total AUM by 2025)
- engage with carbon-intensive firms regarding business model transitions.
- engage with governments to enact policy in line with the Paris Agreement; and
- disclose how our climate risk management activities align with the TCFD framework, while encouraging investee companies to do the same.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

☒ (A) Exposure to physical risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

☒ (B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

☐ (C) Internal carbon price

☒ (D) Total carbon emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

☒ (E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

- ☐ (F) Avoided emissions
- ☐ (G) Implied Temperature Rise (ITR)
- ☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- ☒ (I) Proportion of assets or other business activities aligned with climate-related opportunities

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

- ☐ (J) Other metrics or variables
- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

- ☒ (A) Scope 1 emissions
- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
 - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

- ☒ (B) Scope 2 emissions
- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
 - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

- ☒ (C) Scope 3 emissions (including financed emissions)
- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
 - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.storebrand.no/en/investor-relations/annual-reports/_/attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

- (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☒ (B) The UNFCCC Paris Agreement
- ☒ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☒ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☒ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☒ (G) The International Bill of Human Rights
- ☒ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☒ (I) The Convention on Biological Diversity
- ☒ (J) Other international framework(s)

Specify:

All UN Human Rights Conventions and instruments including: Convention on Elimination of All Forms of Racial Discrimination; Convention on the Elimination of All Forms of Discrimination against Women;

The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; Convention on Rights of the Child; International Convention on the Protection of the Rights of All Migrant Workers and Their Families; The International Convention for the Protection of All Persons from Enforced Disappearance; Convention on Rights of Persons with Disabilities; and the Declaration on the Rights of Indigenous Peoples.

International treaties on environmental protection, including the Rio Conventions (UNFCCC, CBD, UNCCD); the Ramsar Convention on wetlands protection; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); the Bern Convention; the Convention on the Conservation of Migratory Species of Wild Animals (CMS); The Stockholm Convention on persistent organic pollutants (POPs); the Basel Convention on hazardous waste; the Rotterdam Convention on hazardous chemicals; and the Minamata Convention on Mercury.

EU frameworks like the Sustainable Financial Disclosures Regulation and its Principal Adverse Impact and Do No Significant Harm requirements.

- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)

- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2
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What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☐ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☒ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☒ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☒ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2
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Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2
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Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☐ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☐ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☐ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☒ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☒ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ **(A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes**

Explain how these activities were conducted:

We conducted human rights due diligence of our existing portfolios and of potential investments. For potential investments we focused mainly on conflict and high risk countries as well as particularly vulnerable groups and controversies connected to the potential investments whereas for existing investments we conducted a 'wider' human rights due diligence. The human rights due diligence for existing portfolios includes controversy screening and sector risk analysis to identify high risk sectors and industries as well as a country/region risk. This due diligence informs our exclusion processes as well as our reactive and proactive engagements with companies and industries. Please see Storebrand Asset Management Human Rights Due Diligence for more detail

☒ **(B) We assessed whether individuals at risk or already affected might be at heightened risk of harm**

Explain how these activities were conducted:

Please see reply above. Once risk is detected, we engage with companies and or industries to mitigate the risk.

☒ **(C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts**

Explain how these activities were conducted:

When possible we engage with rights holders and their representatives. During the reporting year we engaged, for example, directly with indigenous peoples representatives in connection to the building of a wind park in their territories and with workers regarding anti-union and health and safety practices at a large American company. We also consulted several human rights experts and organizations on many topics ranging from privacy and digital rights to living income, forced labour in Xinjiang or conflict areas.

☒ **(D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities**

Specify:

When engagement did not lead to risk mitigation and companies showed no sign of improvement after engagement, we excluded them to mitigate our exposure to the risk. We also decided not to invest in certain companies after assessing them as high risk.

Explain how these activities were conducted:

See above.

○ (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ **(A) Workers**

Sector(s) for which each stakeholder group was included

- ☐ (1) Energy
- ☐ (2) Materials
- ☐ (3) Industrials
- ☒ (4) Consumer discretionary
- ☒ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

☒ **(B) Communities**

Sector(s) for which each stakeholder group was included

- ☒ (1) Energy
- ☒ (2) Materials
- ☐ (3) Industrials
- ☐ (4) Consumer discretionary
- ☒ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

☐ (C) Customers and end-users

☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

☒ **(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

When engaging with companies regarding actual/potential negative effects of their operations, we looked into company reports and policies to see how they manage these risks and if they report on the actual situation at hand. We also use this to hold companies accountable for the implementation of their own policies and thus mitigate the risk to people.

☒ **(B) Media reports**

Provide further detail on how your organisation used these information sources:

We complement corporate and data providers information by reading media reports and articles on specific issues and to verify information that companies may provide during engagements. Media reports are often used during fact finding regarding a company controversy.

☒ **(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

These are extremely useful when learning about specific issues as experts may write them and also about certain incidents that many not be covered by sustainability data providers since local organizations may have first hand knowledge of some situations. In addition, organizations may express the views of vulnerable communities such as indigenous peoples or workers we may not have the opportunity to come in touch with.

☒ **(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank**

Provide further detail on how your organisation used these information sources:

We also use reports from the UN and Freedom House for country analysis and human rights analysis of communities and conflict areas.

☒ **(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

These data is integrated in risk and opportunities analysis and our own sustainability scores

☒ **(F) Human rights violation alerts**

Provide further detail on how your organisation used these information sources:

This information is used during our human rights due diligence and screening of portfolios in addition to complement all engagements. Severe violations are always assessed against our own exclusion criteria for potential exclusion recommendations.

☐ **(G) Sell-side research**

☒ **(H) Investor networks or other investors**

Provide further detail on how your organisation used these information sources:

Storebrand is member of several investor initiatives where it is common to share information on different human rights risks. Collaboration is extremely valuable to exert leverage and thus the exchange of information within these networks is crucial. Thus, we use this information to identify risk and also to manage them and mitigate through engagement.

☒ **(I) Information provided directly by affected stakeholders or their representatives**

Provide further detail on how your organisation used these information sources:

This first hand information is extremely valuable often because it is not covered by data providers. We use it mostly in reactive engagement or when assessing if excluding or setting a company under observation.

☐ **(J) Social media analysis**

☐ **(K) Other**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

☐ **(A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities**

☒ **(B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities**

Describe:

We discussed grievance mechanisms and remedy often with companies in general and in specific situations when incidents arose. However, we cannot guarantee that these discussions actually led to remedy for those affected during the reported period.

☐ **(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year**

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	○	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○	○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a formal process, but it does not include scenario analyses			
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	○	○	○
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	○	○	○

(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)

Storebrand uses scenarios developed by the Network for Greening the Financial System (NGFS) across our business, including all assets under management. NGFS outlines two scenarios that lead to zero emissions in 2050. The scenario "Net Zero 2050" expects a rapid transition, with a high degree of coordination among nations and sectors. The transition risk in this scenario therefore is seen as low, despite the speed of the transition. The "Divergent Net Zero" scenario considers the transition risk significantly higher, as the use of oil as transportation fuel is phased out very quickly while the use of fossil energy for industrial activities declines more slowly. Storebrand has chosen «Divergent Net Zero» as a basis for the "Speedy transition" scenario. Storebrand's "Delayed transition" scenario is based on the NGFS scenario carrying the same name. In this scenario, emissions continue to rise until 2030, after which policy becomes significantly restrictive. This is expected to result in a rapid decline in emissions after 2030, towards zero in 2050, keeping global warming below 2 degrees. Our last scenario is "Current policies", which is based on the NGFS scenario "Current Policies". In this scenario there will not be policy restrictions beyond those already approved. The transition risk therefore is considered low. Emissions will continue to grow until 2080. Global warming is expected to be about 3 degrees, with a significant risk of even further increases. This will lead to irreversible climate change and extensive physical climate risk. In the models underlying the NGFS scenarios, carbon pricing is used as a measure of how powerful the policy is.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

	(1) Active - quantitative	(2) Active - fundamental
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases
(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases	(1) in all cases	(1) in all cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases	(1) in all cases	(1) in all cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases	(1) in all cases	(1) in all cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors			
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	○	○	○

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Internal Sustainability score

Since 1997, Storebrand has utilized an in-house Sustainability Score as an investment support tool. Since inception, we have improved the score incrementally. We use the Storebrand Sustainability Score, and other qualitative information, to give portfolio managers a better understanding of portfolio companies' performance on sustainability. In addition, the score is used to optimize portfolios towards better performing companies and to calculate an internal fund rating. We calculate the sustainability score on over 4000 companies and base it on a 0-100 scale. The internal sustainability score is used to optimize portfolios towards more sustainable companies and is comprised of two main building blocks, ESG risks and SDG opportunities. On the ESG risk side, the score assesses companies' exposure to, and management of, financially material sustainability risk factors. On the SDG opportunities side, we analyze sustainability data sources and use internal research on solution companies to find companies whose products and services contribute positively to the achievement of financially relevant SDGs. Fund Managers at Storebrand Asset Management are able to access the score on a number of levels. Total Score, Risk Score, SDG Score, and scores for underlying themes within these building blocks, are all readily available. The data sources underpinning the scores are external sources from quality controlled data providers, coupled with internal research. Implementation of the score and underlying scores 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 an attractive SDG positioning, or for assessing the overall exposure on ESG risk and opportunities of a portfolio. One example of how the score is implemented is Storebrand Global Low Volatility, which is an actively managed equity fund that invests in global stock market through a proprietary long-only, model-based factor approach. The objective of the fund is to produce smaller price fluctuations than the fund's benchmark index. The fund is a low volatility fund, but also consider risk in a broader perspective by avoiding investing in companies with high or severe ESG risk. ESG risk is furthermore integrated in the portfolio construction by requiring that average portfolio ESG risk is significantly lower than the benchmark. This is achieved by actively selecting companies with low ESG risk. Currently the fund is well within the top ten percent of global funds on ESG risk according to Morningstar.

Thematic Research/Solutions database

Storebrand operates with a solutions database which consists of companies that significantly contribute to sustainable development without causing substantial harm to environment or society. Solution companies are categorized by four major themes (Climate, Smart Cities, Responsible Consumption and Empowerment), and linked to one or several of the 17 SDGs. On a more granular level, the research is centered around investment themes like renewable energy, technologies for sustainable city development, circular economy and recycling, electric public transport, water management, energy efficiency, sustainable materials and technology, responsible consumption and production, empowerment through access to health services and financial services. Companies are defined as either pure-play or diversified, defined by the proportion of a company's earnings that are linked to a solution we consider to be contributing to solving the SDGs. The solutions database is available for fund managers across our investment teams and serves as valuable research for identification of interesting investment ideas. The research and identification of solution companies is information that is also fed back to and represented in the sustainability score, ensuring an important feedback loop of information being made available to portfolio managers. The database also serves as a basis for thematic portfolios, i.e. on climate solutions or smart cities, both as part of a larger investment portfolio or as thematic investment products. In 2022, 9 per cent of our total equity investments was invested in solution companies.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process			
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	○	○	○

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

Storebrand's index near range of passive funds are subjected to Storebrand's exclusion criteria. The exclusion criteria or "Storebrand standard" is one of the most comprehensive on the market and covers norm-based criteria's from human rights and corruption, to product criteria's such as coal and oil sand, as well as tobacco and controversial weapons. The Storebrand quant team actively seeks alternative exposure to these assets by seeking alternative industries and sectors that behave on the same way as those excluded. This tilts the funds weightings, though maintains a similar risk profile/tracking error.

Another example of how ESG factors influence weighting and tilts in the design of our passively managed funds, is our PLUS-strategy. For example, the Storebrand Global ESG Plus fund uses several data sources to tilt the portfolio away from climate related investment risks and towards climate opportunities. Data sources used in the optimization process include FTSE Green Revenues, Science Based Target, Trucost Carbon Data and Sustainalytics Risk Rating. The internal sustainability score is used for the strategy in two ways. First, the worst in class companies in certain high-risk industries, are excluded from investment by a risk motivation perspective. Second, the rating is used in the portfolio construction process by including a constraint on the minimum weighted average ESG rating of the portfolio when solving for the minimum tracking error solution using MSCI Barra. The carbon intensity is used in the portfolio construction process as a constraint in the same way as described above for the sustainability rating. We have also compiled a list of around 140 companies globally, which deliver products and services, which help to reduce the climate problem. We use a broad range of sources for compiling this list, including studying literature and scenarios on how the low-carbon transition might evolve. In the portfolio construction, a constraint ensures that a minimum percent of the assets is invested in in this list of "green opportunities" stocks. The subsequent weights are chosen on a stock-by-stock basis is determined by the tracking error minimization. The portfolio manager, as a result, has a binary, positive view on this list of stocks, but the actual weights are allocated in a tracking-error minimizing way. The underlying philosophy of the strategy can be summarized as follows: We are active in terms of wanting to invest in a way which promotes the implementation of the Paris Agreement, by avoiding allocating capital to those companies which contribute most to the problem, and by instead redirecting that capital to companies which deliver solutions to the climate challenge problem. However, we are passive in the sense that we do not have a short-term alpha view, and that the portfolio construction process, apart from the climate-related interventions described above, aims to minimize risk towards the MSCI World benchmark (with steps also being taken to ensure a highly liquid portfolio).

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- ☒ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- ☒ (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

- ☒ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

○ (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) Active - quantitative	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	<input type="radio"/>	<input type="radio"/>

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

Storebrand Asset Management offers a range of fossil-free funds that exclude producers and distributors of fossil fuels from the portfolio. This exclusion significantly impacts portfolio construction and affects fund returns. Since inception, our fossil-free funds have consistently outperformed their reference indices due to these exclusions, although there have been shorter periods of fluctuation. For instance, last year we observed stronger performance in certain sectors such as weapons/defense industry and fossil fuel industry, which influenced the returns of portfolios with these specific exclusion criteria. Despite these short-term fluctuations, our firm's long-term investment beliefs and criteria remain unchanged.

Storebrand's range of passive funds closely adheres to Storebrand's exclusion criteria for Sustainable Investments. This criteria, known as the "Storebrand standard," is one of the most comprehensive in the market. It encompasses a wide range of factors, including human rights, corruption, product-based criteria's such as coal and oil sands, as well as tobacco and controversial weapons. The Storebrand quant team actively seeks alternative exposure to the assets excluded by identifying industries and sectors that exhibit similar behaviors. This approach adjusts fund weightings while maintaining a comparable risk profile and tracking error. A notable example is the Global Index fund. Importantly, the implementation of the "Storebrand standard" criteria has not resulted in any additional costs or negatively impacted realized fund returns.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our listed equity assets subject to ESG screens

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	○	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○	○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

	(1) SSA	(2) Corporate
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a formal process, but does it not include scenario analyses		
(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion	○	○
(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets	○	○

(A) Yes, we have a formal process that includes scenario analyses - Specify: (Voluntary)

Storebrand uses scenarios developed by the Network for Greening the Financial System (NGFS) across our business, including all assets under management. NGFS outlines two scenarios that lead to zero emissions in 2050.

The scenario "Net Zero 2050" expects a rapid transition, with a high degree of coordination among nations and sectors. The transition risk in this scenario therefore is seen as low, despite the speed of the transition. The "Divergent Net Zero" scenario considers the transition risk significantly higher, as the use of oil as transportation fuel is phased out very quickly while the use of fossil energy for industrial activities declines more slowly. Storebrand has chosen «Divergent Net Zero» as a basis for the "Speedy transition" scenario. Storebrand's "Delayed transition" scenario is based on the NGFS scenario carrying the same name. In this scenario, emissions continue to rise until 2030, after which policy becomes significantly restrictive. This is expected to result in a rapid decline in emissions after 2030, towards zero in 2050, keeping global warming below 2 degrees. Our last scenario is "Current policies", which is based on the NGFS scenario "Current Policies". In this scenario there will not be policy restrictions beyond those already approved. The transition risk therefore is considered low. Emissions will continue to grow until 2080. Global warming is expected to be about 3 degrees, with a significant risk of even further increases. This will lead to irreversible climate change and extensive physical climate risk.

In the models underlying the NGFS scenarios, carbon pricing is used as a measure of how powerful the policy is.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(1) SSA	(2) Corporate	(4) Private debt
(A) We incorporate material environmental and social factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) We incorporate material governance-related factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

☒ **(A) We use a qualitative ESG checklist**

Select from dropdown list:

☒ **(1) in all cases**

- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity**

Select from dropdown list:

☐ (1) in all cases

☐ (2) in a majority of cases

☒ **(3) in a minority of cases**

☒ **(C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy**

Select from dropdown list:

☒ **(1) in all cases**

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ **(D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available**

Select from dropdown list:

☐ (1) in all cases

☐ (2) in a majority of cases

☒ **(3) in a minority of cases**

☐ (E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function

☐ (F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates

☐ (G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process

☐ (H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

	(1) SSA	(2) Corporate	(3) Private debt
(A) We incorporate it into the forecast of financial metrics or other quantitative assessments			
(B) We make a qualitative assessment of how material ESG factors may evolve	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) We do not incorporate significant changes in material ESG factors	○	○	○

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

	(1) SSA	(2) Corporate
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways		
(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	○	○

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process			
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

☒ (A) We used a qualitative ESG checklist

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (D) We used industry body guidelines

Select from dropdown list:

- ☐ (1) in all cases
- ☐ (2) in the majority of cases
- ☒ (3) in the minority of cases

☐ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments

- ☐ (F) We did not incorporate material ESG factors when monitoring private debt investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

To comply with Storebrand's emissions reduction target of 32% by 2025, the mandate of certain FI funds require the funds to be fossil-free, in accordance with Storebrand's additional fossil-free exclusion criterion. The holdings of these funds were screened against the parameters of the fossil-free criterion, and companies identified as having more than 5% revenue from production or distribution of fossil energy were excluded from the portfolio. Until now this have had little impact on returns. By use of quantitative methods portfolio managers have identified alternative investments with risk- and return characteristics comparable to those of the excluded companies.

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 15	PLUS	OO 20, OO 21	N/A	PUBLIC	Thematic bonds	3

What percentage of environmental, social and/or other labelled thematic bonds held by your organisation has been verified?

As a percentage of your total labelled bonds:

(A) Third-party assurance

(B) Second-party opinion

(4) >50–75%

(C) Approved verifiers or external reviewers (e.g. via CBI or ICMA)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Thematic bonds	1

What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?

- ☒ (A) The bond's use of proceeds
- ☒ (B) The issuers' targets
- ☒ (C) The issuers' progress towards achieving their targets
- ☒ (D) The issuer profile and how it contributes to their targets
- ☐ (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- ☐ (F) Not applicable; we do not invest in non-labelled thematic bonds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	CORE	Multiple, see guidance	N/A	PUBLIC	Thematic bonds	1, 2, 6

During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?

- ☐ (A) We engaged with the issuer
- ☐ (B) We alerted thematic bond certification agencies
- ☐ (C) We sold the security
- ☐ (D) We blacklisted the issuer
- ☐ (E) Other action
- ☐ (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year

● (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our fixed income assets subject to ESG screens

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

☒ **(A) Sustainability outcome #1**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ **(1) The UN Sustainable Development Goals (SDGs) and targets**

☒ **(2) The UNFCCC Paris Agreement**

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☒ **(1) Environmental**

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

(4) Number of targets set for this outcome

☐ (1) No target

☐ (2) One target

☒ **(3) Two or more targets**

☒ **(B) Sustainability outcome #2**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ **(1) The UN Sustainable Development Goals (SDGs) and targets**

☒ **(2) The UNFCCC Paris Agreement**

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☒ **(9) The Convention on Biological Diversity**

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☒ (1) **Environmental**

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Eliminate commodity driven deforestation by 2025

(4) Number of targets set for this outcome

o (1) No target

● (2) **One target**

o (3) Two or more targets

☒ (C) **Sustainability outcome #3**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☐ (1) The UN Sustainable Development Goals (SDGs) and targets

☐ (2) The UNFCCC Paris Agreement

☒ (3) **The UN Guiding Principles on Business and Human Rights (UNGPs)**

☒ (4) **OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☒ (7) **The International Bill of Human Rights**

☒ (8) **The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions**

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☐ (1) Environmental

☒ (2) **Social**

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Substantial alignment with UN Guiding Principles

(4) Number of targets set for this outcome

o (1) No target

● (2) **One target**

o (3) Two or more targets

☒ (D) **Sustainability outcome #4**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☐ (1) The UN Sustainable Development Goals (SDGs) and targets

☐ (2) The UNFCCC Paris Agreement

☒ (3) **The UN Guiding Principles on Business and Human Rights (UNGPs)**

☒ (4) **OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☒ (7) **The International Bill of Human Rights**

☒ (8) **The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions**

☐ (9) The Convention on Biological Diversity

☒ (10) **Other international, regional, sector-based or issue-specific framework(s)**

(2) Classification of sustainability outcome

☐ (1) Environmental

☒ (2) **Social**

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Living wages acknowledged in target sectors

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

☒ (E) Sustainability outcome #5

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☒ (1) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (2) The UNFCCC Paris Agreement
- ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☐ (5) The EU Taxonomy
- ☐ (6) Other relevant taxonomies
- ☐ (7) The International Bill of Human Rights
- ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☒ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☒ (1) Environmental
- ☐ (2) Social
- ☐ (3) Governance-related
- ☐ (4) Other

(3) Sustainability outcome name

Protect and restore biodiversity through our finance activities and investments

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

- ☐ (F) Sustainability outcome #6
- ☐ (G) Sustainability outcome #7
- ☐ (H) Sustainability outcome #8
- ☐ (I) Sustainability outcome #9
- ☐ (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)
(1) Target name	32% reduction in GHG (scope 1 and 2)

(2) Baseline year	2018
(3) Target to be met by	2025
(4) Methodology	<p>Definition: The GHG intensity target describes a reduction of the impact of all corporate investments in (i) Equity and Fixed income instruments for scope 1 and 2 managed by SAM Group from the established baseline and (ii) Real estate.</p> <p>Calculation:</p> <p>(i) For Equity and Fixed income: Reduction in GHG intensity is calculated based on a market value-adjusted baseline for portfolios in scope from the end of 2018 against an equivalent updated market-adjusted GHG intensity. All positions are valued in NOK on valuation day.</p> <p>(ii) For Real estate: Annual CO2 emissions from direct real estate investments under operational control, per square meter of heated area. Includes direct and indirect emissions (Scope 1-3), including the tenant's energy and water consumption as well as waste production. The carbon footprint is calculated by Cemsys AS in accordance with the GHG protocol (The Greenhouse Gas Protocol), based on metered energy, waste and water volumes on sites. The Nordic mix emission factor is the basis for calculating the location-based emissions from electricity.</p>
(5) Metric used (if relevant)	Scope 1 and 2
(6) Absolute or intensity-based (if relevant)	(2) Intensity-based
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(1) Yes

(A2) Sustainability Outcome #1: Target details

(A2) Sustainability Outcome #1:	Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)
(1) Target name	15% of AUM allocated to solutions
(2) Baseline year	2018
(3) Target to be met by	2025

(4) Methodology	<p>Storebrand uses the KPI "Solutions exposure", defined as investments aligned with the UN Sustainable Development Goals. Companies contributing to a sustainable development through products or services are eligible to our definition of a Solution, and we include both equity and debt investments in our calculations. Furthermore, we include green bonds, infrastructure, certified Real Estate and impact-focused Private Equity in our definition of a Solution investment.</p> <p>On equity and debt investments we will estimate the solution exposure of a company, and the solution exposure will range from 25% to 100%, which will impact our estimate of aggregate solution exposure of a portfolio.</p> <p>When searching for eligible Solutions we align our assessment to the UN Sustainable Development Goals, but our focus is on four main themes; climate, sustainable cities, circular economy and equal opportunities.</p> <p>We use external data providers in assessing the broader investment universe on topics we consider having an acceptable data quality. However, in our experience an outright quantitative method is not yet sufficient for us to fully analyze the market opportunities, and hence we still need to deploy extensive qualitative analysis in order to improve on our opportunity set and qualify relevant companies. The qualitative process is fully internal, and all investment teams are able to qualify companies under strict guidelines on what should be considered.</p> <p>We focus on what companies provide to the market in terms of products and services, and to what extent the solution provided is relevant to the success of the company, and mindful of the "do no significant harm"-principle. The estimate of solution exposure is focused on revenue, but we are mindful smaller companies in a start-up phase may represent great opportunities.</p>
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(5) Metric used (if relevant)	Solutions exposure
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(1) Yes
(B1) Sustainability Outcome #2: Target details	
(B1) Sustainability Outcome #2:	Eliminate commodity driven deforestation by 2025
(1) Target name	Eliminate deforestation by 2025
(2) Baseline year	2019

(3) Target to be met by	2025
(4) Methodology	<p>We annually assess our investment portfolio for deforestation risk exposure, based on best available data. We developed a screening methodology in 2020, based on the datasets Forest 500 and Trase. Storebrand is actively supporting initiatives to improve data quality on deforestation, such as through the Forest IQ initiative, which is expected to launch in October 2023. We will update and improve our screening methodology by the end of 2023.</p> <p>In our most recent screening (2022) of the 350 companies and 150 financial institutions included in Forest 500, Storebrand had equity or bond investments in 109 companies and 149 financial institutions, most of which had indirect exposure to deforestation through supply chains or financial relationships. Using Forest 500 company rankings, and other data sources like Trase, we group companies into high, medium, and low risk, based on their exposure to and management of risk. 23 companies and 95 financial institutions were classed as high risk, defined as scoring below 20% in the Forest 500 ranking of deforestation commitments and reporting.</p>
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(2) No
(C1) Sustainability Outcome #3: Target details	
(C1) Sustainability Outcome #3:	Substantial alignment with UN Guiding Principles
(1) Target name	Substantial alignment with UNGP by 2030
(2) Baseline year	
(3) Target to be met by	2030

(4) Methodology

The methodology used to meet this target is qualitative and conducted mainly by our team but also by using data from data providers. Companies are assessed as to how they meet the UNGP.

By substantial alignment with the UNGP, we mean: ('Respect pillar' + grievance principle 31)

- Principles 11 to 15 - Respect for human rights
- Principle 16 - Policy commitment
- Principles 17 to 20 - Human rights due diligence
- Principle 21 - Reporting on adverse human rights impacts
- Principle 22 - Providing remediation and or using leverage to provide remediation
- Principle 31 - Operational level grievance mechanism

This is implemented by identifying controversies and lack of remediation through our controversy screening as well as our engagement with affected companies. Lack of policy commitment, human rights due diligence, reporting on human rights impacts and grievance mechanism is identified via specific indicators provided by our sustainability data providers and will be discussed with companies during engagements to mitigate. Potential exclusions for companies not meeting the target are assessed by the Risk and Active Ownership team based on Storebrand's policies and guidelines and company expectation documents.

The main approach used to meet this target across our portfolios is engagement and voting. This is implemented by always integrating this outcome in our engagement strategies with all investee companies and by supporting/filing/co-filing shareholder proposals to this end as well as voting against board directors if relevant. Storebrand will also continue to publicly support policy making and legislation aiming to create legally binding requirements for companies to conduct human rights due diligence and respect human rights through the entire value chain.

By 'Substantial' alignment, we mean that companies at a minimum meet EU SFDR Principle Adverse Impacts 11 and 10 as sourced from data providers, analyzed by our team and applied to all portfolios:

- (1) Compliance with SFDR PAI 11: Processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- (2) Compliance with SFDR PAI 10: no severe violations of Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this?

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4: Living wages acknowledged in target sectors

(1) Target name Living wages acknowledged: target sectors by 2030

(2) Baseline year

(3) Target to be met by 2030

(4) Methodology

As a member of the Platform for Living Wages Financials, Storebrand works towards achieving a living wage and income for the Agrifood and Food Retail as well as the textile sectors. Over the years, Storebrand has assessed these sectors as high-risk for a range of labour rights and in particular wages.

Working together with 19 investors gives us the leverage to raise this issue to the top of companies agendas.

Unfortunately, being a systemic issue, progress is slow and this is why so far, our target for 2030 for these sectors is that at a minimum companies recognize the importance of living wages and living income as a salient issue. However, this target will be revised and made more ambitious if we see setting more ambitious targets realistic based on company progress.

Storebrand considers a living wage as an income from work that is at least enough to sustain the necessities of a decent life for the worker and their family, locally in their community.

These necessities are: food, water, housing, education, health care, transportation, clothing, and other essential needs, including provision for unexpected events.

The companies are assessed and engaged in annual cycles, which start by first analyzing the progress made by the company in the previous cycle and where there could be improvements in order to prepare the strategy for the round of engagements.

The cycle usually starts in February ending in November.

The methodology used to assess progress and making the grounds of our engagements with companies is adapted to each sector's activity. However, some main elements are common to all sectors informed by the UNGPs:

- If living wages are integrated in the company's policies as well as in their requirements to their suppliers,
- To what extent the company engages with stakeholders on the topic of living wages and/or living income;
- How does the company identify, assess and manage living wages/income at own operations and in its supply chain
- How does the company align its procurement practice to allow improvements for example at farm-level income or living wages for workers at suppliers
- How does the company track and measure its efforts and success aimed at improvement of living wages/income?
- If the company has in place appropriate grievance mechanism enabling effective remedy

Once all companies are engaged and assessed, the results are compared and discussed in working groups for accuracy and correct allocation of scores., Then the companies are ranged as to the progress made and a report is made and published. We share the results and the final report with companies with the aim to inspire improvement and remind them of the next cycle of the next coming assessment cycle.

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5:	Protect and restore biodiversity through our finance activities and investments
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(1) Target name

(2) Baseline year

(3) Target to be met by

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(E2) Sustainability Outcome #5: Target details

(E2) Sustainability Outcome #5: Protect and restore biodiversity through our finance activities and investments

(1) Target name

(2) Baseline year

(3) Target to be met by

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2.1	PLUS	SO 1, SO 2	N/A	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your long-term targets.

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(A1) Sustainability Outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)	32% reduction in GHG (scope 1 and 2)	2050	Net zero by 2050
(A2) Sustainability Outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)	15% of AUM allocated to solutions	2050	20% of AUM allocated to solutions by 2030

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- ☐ (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- ☐ (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- ☐ (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- ☒ (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
 - ☐ (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

Target name: 32% reduction in GHG (scope 1 and 2)

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(A2) Sustainability outcome #1:

(A2) Sustainability outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

Target name: 15% of AUM allocated to solutions

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: Eliminate commodity driven deforestation by 2025

Target name: Eliminate deforestation by 2025

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(C1) Sustainability outcome #3:

(C1) Sustainability outcome #3: Substantial alignment with UN Guiding Principles

Target name: Substantial alignment with UNGP by 2030

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(D1) Sustainability outcome #4:

(D1) Sustainability outcome #4: Living wages acknowledged in target sectors

Target name: Living wages acknowledged: target sectors by 2030

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

(1) Target name 32% reduction in GHG (scope 1 and 2)

(2) Target to be met by 2025

(3) Metric used (if relevant) Scope 1 and 2

(4) Current level or amount (if relevant)

(5) Other qualitative or quantitative progress	(i) For Equity and Fixed income: -36.7% (ii) For Real Estate: -43 %
(6) Methodology for tracking progress	(i) For Equity and Fixed income: Reduction in GHG intensity is calculated based on a market value-adjusted baseline for portfolios in scope from the end of 2018 against an equivalent updated market-adjusted GHG intensity. All positions are valued in NOK on valuation day. (ii) For Real estate: Annual CO2 emissions from direct real estate investments under operational control, per square meter of heated area. Includes direct and indirect emissions (Scope 1-3), including the tenant's energy and water consumption as well as waste production. The carbon footprint is calculated by Cemasys AS in accordance with the GHG protocol (The Greenhouse Gas Protocol), based on metered energy, waste and water volumes on sites. The Nordic mix emission factor is the basis for calculating the location-based emissions from electricity.

(A2) Sustainability outcome #1: Target details

(A2) Sustainability outcome #1:	Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)
(1) Target name	15% of AUM allocated to solutions
(2) Target to be met by	2025
(3) Metric used (if relevant)	Solutions exposure
(4) Current level or amount (if relevant)	
(5) Other qualitative or quantitative progress	13%
(6) Methodology for tracking progress	Allocation to Solutions is calculated based on the market value of all Solution positions against the total asset under management for the SAM Group. All positions are valued in NOK on valuation day.

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	Eliminate commodity driven deforestation by 2025
(1) Target name	Eliminate deforestation by 2025
(2) Target to be met by	2025
(3) Metric used (if relevant)	

(4) Current level or amount (if relevant)

In our most recent screening (2022) of the 350 companies and 150 financial institutions included in Forest 500, Storebrand had equity or bond investments in 109 companies and 149 financial institutions, most of which had indirect exposure to deforestation through supply chains or financial relationships. Using Forest 500 company rankings, and other data sources like Trase, we group companies into high, medium, and low risk, based on their exposure to and management of risk. 23 companies and 95 financial institutions were classed as high risk, defined as scoring below 20% in the Forest 500 ranking of deforestation commitments and reporting.

(5) Other qualitative or quantitative progress

Engagement: Alone or in collaboration with other financial institutions, we engage the companies in our holdings that have the highest risk exposure and/or the greatest opportunity to contribute to ending deforestation. Storebrand Asset Management is part of the collaborative engagement platform Finance Sector Deforestation Action (FSDA). This group of 35 investors with US\$8,9 trillion AUM has identified 80 companies to engage, divided up responsibilities for leading engagements, and created a set of expectations for how companies should eliminate commodity-driven deforestation from their operations, supply chains and financing by 2025. In the reporting year, Storebrand was actively involved in 92 ongoing engagements with 79 companies on the subject of deforestation.

Engagement with policymakers: Storebrand Asset Management Investor is co-founder and co-chair of the Investor Policy Dialogue on Deforestation (IPDD), a collaborative investor-led initiative to engage with public authorities and industry associations in Brazil and Indonesia and in import markets like the EU, UK, USA and China. As of June 2023, IPDD is supported by 78 financial institutions from 20 countries. The coalition now represents approximately US \$10 trillion of AUM

Disclosure: We will report annually on our portfolio exposure to deforestation risk and our main actions to implement this policy. We will cooperate with other financial institutions to promote standards for measuring, monitoring and reporting on direct and indirect deforestation risk exposure. In the past year, we have contributed to include disclosure on deforestation in the Net Zero Standard for Banks; participated in the FSDA work stream engaging with ESG data providers to improve data products on deforestation; and collaborated in the Forest IQ investor advisory group.

(6) Methodology for tracking progress

We annually assess our investment portfolio for deforestation risk exposure, based on best available data. We developed a screening methodology in 2020, based on the datasets Forest 500 and Trase. Storebrand is actively supporting initiatives to improve data quality on deforestation, such as through the Forest IQ initiative, which is expected to launch in October 2023. We will update and improve our screening methodology by the end of 2023.

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: Substantial alignment with UN Guiding Principles

(1) Target name Substantial alignment with UNGP by 2030

(2) Target to be met by 2030

(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	
(5) Other qualitative or quantitative progress	<p>During the reporting period, we mapped and assessed companies' negative human rights impact, and if they implemented suitable measures to stop, prevent or limit negative consequences and thus to what extent they are in alignment with the UNGP for the following risks:</p> <p>working conditions in supply chains; forced labor; gender, diversity and inclusion; living wages; right to participate in trade unions and children's rights; employee rights and local community rights in the green transition (just transition); indigenous peoples rights; human rights in high-risk countries; human rights in conflict areas.</p> <p>The risks were identified for, among others, the following sectors: renewable energy, oil and gas; mining; textile; food and agriculture; information and telecommunications technology; building and infrastructure.</p> <p>As part of due diligence process, we have used various measures to manage and reduce the risks: exclusions, reactive and proactive dialogue with companies, observation lists and screening before investment.</p> <p>This work has also made it possible to avoid including companies in the portfolios or investing in the first place on companies that have a significant risk of human rights violations.</p> <p>This has resulted, among other things, in the exclusion of 13 companies based on our criteria for human rights and international humanitarian law, and reduced risks related to violations of human rights in our portfolios. In addition, and prior to investment, we avoided investing in 11 companies that were linked to high-risk countries. The list of exclusions is published on our website.</p> <p>We have had a proactive dialogue with over 15 industries, mainly through collaboration in various investor initiatives, and have voted on over 195 social shareholder proposals at general meetings in 2023.</p>
(6) Methodology for tracking progress	<p>During 2022, asses progress made by our engagements and count our exclusions. During 2023, SFDR PAI 10 and 11 screening from data providers will be added.</p>

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4:	Living wages acknowledged in target sectors
(1) Target name	Living wages acknowledged: target sectors by 2030
(2) Target to be met by	2030
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	

During 2022, Garment & Footwear sector:

Policy commitments and operational understanding of living wages became more robust. Most brands scored also reasonably well in the implementation of responsible purchasing practice, the development of wage management strategies and commitments to pay suppliers on time for example.

(5) Other qualitative or quantitative progress

For the Agri-food and Food retail progress is slower than for the textile industry which has been engaged on this topic by investors and organizations much longer. However, we could see that some leading agri-food companies are starting to set ambitious goals on achieving living income at farm level by 2030. For new comers, we saw that although living wages are not formally integrated in policies, at least they may be referencing to adequate wages or fair wages in sustainability reports. However, in general these sectors still have much room for improvement.

(6) Methodology for tracking progress

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
 - Select from drop down list:
 - ☒ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☒ (B) Stewardship: engagement with external investment managers
 - Select from drop down list:
 - ☒ (1) Individually
 - ☐ (2) With other investors or stakeholders
- ☒ (C) Stewardship: engagement with policy makers
 - Select from drop down list:
 - ☒ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☒ (D) Stewardship: engagement with other key stakeholders
 - Select from drop down list:
 - ☒ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☒ (E) Capital allocation
 - ☐ (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Capital allocation activities used

(1) Asset class allocation
(4) Divestment from assets or sectors

(2) Explain through an example

Storebrand's Exclusion Policy sets out a range of exclusion criteria that applies to all or some funds. For example, companies with more than 5% revenue from coal are excluded from all funds. Another examples is the target to allocate 15% of AUM to companies providing solutions, defined as contributing to one or more SDGs with at least 25% of revenues from such activities.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

(1) Capital allocation activities used

(2) Explain through an example

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

Eliminate commodity driven deforestation by 2025

(1) Capital allocation activities used

(2) Explain through an example

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Substantial alignment with UN Guiding Principles

(1) Capital allocation activities used

(2) Explain through an example

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Living wages acknowledged in target sectors

(1) Capital allocation activities used

(2) Explain through an example

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Protect and restore biodiversity through our finance activities and investments

(1) Capital allocation activities used

(2) Explain through an example

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 7	PLUS	OO 17 FI, SO 1	N/A	PUBLIC	Capital allocation	1

During the reporting year, did you use thematic bonds to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

Thematic bond(s) label

(A) Sustainability Outcome #1:
Alignment of financial flows toward
the goal of the Paris agreement
(article 2.1.c)

(A) Green/climate bonds
(D) Sustainability-linked bonds

(B) Sustainability Outcome #2:
Eliminate commodity driven
deforestation by 2025

(C) Sustainability Outcome #3:
Substantial alignment with UN
Guiding Principles

(D) Sustainability Outcome #4:
Living wages acknowledged in
target sectors

(E) Sustainability Outcome #5:
Protect and restore biodiversity
through our finance activities and
investments

STEWARDSHIP WITH INVESTEEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

We use our position as owners to influence issuer 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

believe in a combination of dialogue, exclusion, inclusion and integration.

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. This engagement can be both direct individually and/or in collaboration with other investors. Both

approaches can be very effective in addressing concerns regarding environmental, social and corporate governance (ESG) issues in order to reduce adverse sustainability impact. Combined, they can reinforce each other and be an effective signal to companies regarding our views on

important ESG issues.

Our engagement strategy emphasizes a positive impact (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. This also allows for more proactive engagement. The decision to engage with selected companies is made based on our assessment of the significance of a

particular matter, the size of holdings, comparison of 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 largest investment

exposure against salient climate, biodiversity or human rights risks inherent to these industries leading to the prioritization of engagements to mitigate these risks.

Storebrand Asset Management also uses its voting rights in order to reduce the adverse sustainability impact companies in its portfolios may cause and advance the sustainability agenda. We believe combining engagement with companies and voting is a good strategy to achieve change in corporate behaviour and thus reduce adverse impact. Engagement includes both dialogue with companies and voting. Voting can exert extra influence over companies we are engaging with or just to signal that some sustainability issues are important to us.

(2) Stewardship tools or activities used	<div>(1) Engagement</div> <div>(2) (Proxy) voting at shareholder meetings</div> <div>(3) Filing of shareholder resolutions or proposals</div> <div>(4) Nominating directors to the board</div>
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(3) Example	<div>Collaboration on nature within the Nature Action 100</div> <div> <p>With mounting evidence of nature's decline and the crucial role of natural ecosystems in sustaining business operations and livelihoods, the need for global financial markets and agricultural and industrial firms to address nature loss is urgent. Storebrand is committed to making nature impact an intrinsic part of its investment process, and to engaging companies on it.</p> <p>This is codified in the nature policy we adopted in 2022.</p> <p>We therefore have started engaging with companies as part of the Nature Action 100 (NA100) global investor engagement initiative, of which we are founding partner. The NA100, which currently comprises of 190 institutional investors, representing USD 23.6 trillion of assets under management or advice, focuses on driving greater corporate ambition and action to reduce nature and biodiversity loss.</p> <p>The sectors that the Nature Action 100 focuses on include biotechnology and pharmaceuticals; chemicals; household and personal goods; consumer goods retail; food; food and beverage retail; forestry and paper; and metals and mining. These sectors are major drivers of nature loss, due to their large impacts on habitat loss, overexploitation of resources, and soil, water, and solid waste pollution.</p> </div>
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In June 2023, the NA100 published a set of investor expectations for companies, outlining six actions that we the investors will call on companies to take, in terms of: ambition, assessment, targets, implementation, governance, and engagement.

In September 2023, the NA100 followed this up, by first publicising a list of 100 companies that we as a group will focus on engaging with, and then by sending off initial letters to the companies.

These letters include a formal communication regarding investor expectations for companies, which have collectively been aligned on by the NA100's participating companies. The 100 companies have been selected based on their key role in one of eight sectors that are major drivers of worldwide nature loss, which we had together identified for initial investor engagement.

NA100 will conduct annual benchmark analyses to track the progress of the companies against the formally communicated investor expectations, which outline the timely and necessary steps that the companies must take to protect and restore nature and natural ecosystems.

The benchmarks will also provide needed insight into sectoral action on nature and biodiversity across the globe. Investor participants from the initiative engage companies individually, or as part of engagement teams with other participating investors. Individuals and engagement teams will submit regular updates on their engagements.

The companies that Storebrand is engaged with, within this process are Essity, Norvo Nordisk, UPM and Stora Enso. The initial meetings in these engagements have focused on companies' current ambitions, the quality of materiality assessments by the companies, target setting and nature governance within the organization.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)
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(1) Describe your approach	
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(2) Stewardship tools or activities used	
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(3) Example	
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(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	Eliminate commodity driven deforestation by 2025
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(1) Describe your approach	
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(2) Stewardship tools or activities used	
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(3) Example

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Substantial alignment with UN Guiding Principles

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Living wages acknowledged in target sectors

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Protect and restore biodiversity through our finance activities and investments

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

☒ **(A) We prioritise the most strategically important companies in our portfolio.**

Describe how you do this:

Our engagement strategy emphasizes a positive impact (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. This also allows for more proactive engagement. The decision to engage with selected companies is made based on our assessment of the significance of a particular matter, the size of holdings, comparison of 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 largest investment exposure against salient climate, biodiversity or human rights risks inherent to these industries leading to the prioritization of engagements to mitigate these risks.

Select from the list:

- ☒ 2
- ☐ 4

☒ **(B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.**

Describe how you do this:

Our engagement strategy emphasizes a positive impact (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. This also allows for more proactive engagement. The decision to engage with selected companies is made based on our assessment of the significance of a particular matter, the size of holdings, comparison of 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 largest investment exposure against salient climate, biodiversity or human rights risks inherent to these industries leading to the prioritization of engagements to mitigate these risks.

Select from the list:

- ☒ 1
- ☐ 4

☒ **(C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.**

Describe how you do this:

We have a special engagement stream with at least 20 of the companies that create the highest share of owned emissions in our portfolios.

Select from the list:

- ☒ 3
- ☐ 4

☐ (D) Other

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 11	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, how did your organisation use engagement with policy makers to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: Eliminate commodity driven deforestation by 2025

(1) Describe your approach Participating in collaborative investor engagement with policy-makers, regulators and trade associations to promote sustainable forest management and land use

(2) Engagement tools or activities used

(1) We participated in 'sign-on' letters
(4) We engaged policy makers on our own initiative

(3) Example(s) of policies engaged on

In 2020 Storebrand initiated (and co-chairs) along with BlueBay Asset Management the Investors Policy Dialogue on Deforestation (IPDD). This investor alliance engages with public agencies and industry associations in selected countries on deforestation. The IPDD is now supported by 64 global institutional investors from 19 countries. The coalition now represents approximately USD 10 trillion of AUM. Storebrand is also co-chairing the Brazil working group. The IPDD group engages with policymakers, regulators, politicians and relevant government authorities, industry associations and other relevant stakeholders (which may include companies, civil society, academia or the media), both domestic and foreign. Dialogue encourages adoption and implementation of regulatory frameworks that ensure sustainable use of forests, native vegetation and human rights. Producing countries workstreams (Brazil, Indonesia) focus on the supply side, while the Consumer Countries workstream addresses the demand side of the issue.

Since the initiative began, the IPDD has contributed to significant progress in terms of awareness-raising and identifying and meeting with key stakeholders that hold the key to halting and reversing deforestation. A clear message has been conveyed to governments that financial market participants and investors consider deforestation to pose investment-relevant, material risks and may affect access to capital markets. Exchanging information has increased policy makers' understanding of how deforestation is incorporated into investors' analyses of sovereigns and companies operating in their countries, and that the management of critically important natural resources, such as forests, influences governments' ability to secure external funding. IPDD has helped demonstrate government engagement adds value.

The IPDD initiative contributes to the number of investor-related ESG/sustainability initiatives which focus on systematic stewardship to tackle issues like deforestation. The IPDD initiative has already been cited as a good model of public policy engagement which could be applied to other topics, demonstrating both IPDD's impact to date, and how increasingly important this sort of engagement is seen to be by external stakeholders. The group has created a space for, and added weight to, the efforts of other stakeholders in these countries who share investor's concerns about deforestation risks. By all parties sharing insights and perspectives, it has been possible to identify shared objectives, barriers and potential solutions with relevant stakeholders both inside and outside the country. The IPDD has raised general awareness, including broader investor awareness about the issue of deforestation risk.

The IPDD coalition has nearly doubled in size in two years. It provides a forum for more coordinated and direct engagement for investors. The initiative also provides a basis for additional country workstreams to develop. IPDD's public engagement, including media coverage and press releases alerting other investors about key engagements, has helped highlight unsustainable land use and encouraged other stakeholders to proactively engage and collaborate.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Substantial alignment with UN Guiding Principles

(1) Describe your approach Support human right due diligence regulation at national and international level

(2) Engagement tools or activities used (1) We participated in 'sign-on' letters
(5) Other methods

(3) Example(s) of policies engaged on	Storebrand has supported several investor statements in connection to a robust Corporate Sustainability Due Diligence Directive, which also covers the financial sector. In Norway, we sit at the board of KAN, a coalition of civil society and business that has been working towards a human rights due diligence law in Norway. The law was passed in 2021 and we participate in panels and organize seminar to discuss its implementation.
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(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:	Living wages acknowledged in target sectors
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(1) Describe your approach	Through the Platform Living Wages Financials, we have reached out to the ILO
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(2) Engagement tools or activities used	(1) We participated in 'sign-on' letters
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(3) Example(s) of policies engaged on	
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(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:	Protect and restore biodiversity through our finance activities and investments
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(1) Describe your approach	
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(2) Engagement tools or activities used	
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(3) Example(s) of policies engaged on	
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STEWARDSHIP: ENGAGEMENT WITH OTHER KEY STAKEHOLDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 12	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with other key stakeholders	2, 5

Does your organisation engage with other key stakeholders to support the development of financial products, services, research, and/or data aligned with global sustainability goals and thresholds?

(A) Across all sustainability outcomes

(1) Key stakeholders engaged	(1) Standard setters (6) External service providers (e.g. proxy advisers, investment consultants, data providers) (7) Academia (8) NGOs (9) Other key stakeholders
(2) Provide further detail on your engagement	Storebrand actively engages with key stakeholders like NGOs, academic researchers, data vendors and standard setters to contribute to improving availability of data on ESG issues. We participate in developing and testing tools, data sets and methodologies that may be useful to assess and manage ESG risks and opportunities in our investment portfolios.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	Alignment of financial flows toward the goal of the Paris agreement (article 2.1.c)
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	Eliminate commodity driven deforestation by 2025
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:	Substantial alignment with UN Guiding Principles
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(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:	Living wages acknowledged in target sectors
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(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:	Protect and restore biodiversity through our finance activities and investments
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(1) Key stakeholders engaged

(2) Provide further detail on your engagement

STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

(1) Name of the initiative	Institutional Investor Group on Climate Change (IGCC)
(2) Indicate how your organisation contributed to this collaborative initiative	<p>(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)</p> <p>(C) We publicly endorsed the initiative</p>
(3) Provide further detail on your participation in this collaborative initiative	<p>Institutional Investor Group on Climate Change (IGCC) is a collaborative initiative aimed at ensuring that banks carry out their critical role in driving capital flows towards supporting the global transition to a 1.5°C decarbonisation pathway, Storebrand participates in the working group on banks which engages collaboratively with 27 global banks to accelerate progress towards a net zero economy. The investor group has set four high-level expectations for banks:</p> <ul style="list-style-type: none"> – A clear commitment to support the goal of net-zero GHG emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C; – Science-based short- and medium-term targets supported by credible transition plans detailing how these targets will be met, including critical dependencies; Strong climate governance that ensures board responsibility for delivery of the net zero transition plan, effective internal controls and Paris-aligned lobbying of governments and other key stakeholders, and; – Regular reporting on delivery of climate commitments, following guidance by the Task Force for Climate Related Disclosures, and climate-related financial reporting.

(B) Initiative #2

(1) Name of the initiative	Climate Action 100+
(2) Indicate how your organisation contributed to this collaborative initiative	<p>(A) We were a lead investor in one or more focus entities (e.g. investee companies)</p> <p>(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)</p> <p>(C) We publicly endorsed the initiative</p>

(3) Provide further detail on your participation in this collaborative initiative

Climate Action 100+ is an investor-led initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change. 171 focus companies have been selected for engagement, including the Norwegian company Equinor for which Storebrand is one of the CA100+ lead investors. Together, we have communicated expectations together that Equinor should implement climate change risk oversight and accountability into their governance framework; reduce GHG emissions across their value chain in line with the 1.5C target of the Paris Agreement on climate change; as well as to transparently disclose and implement transition plans that involve robust targets.

(C) Initiative #3

(1) Name of the initiative

Investor Alliance for Human Rights.
The alliance focuses on the investor responsibility to respect human rights and thus facilitates investor corporate engagement that drive responsible business conduct and standard-setting activities that push for robust business and human rights standards.

(2) Indicate how your organisation contributed to this collaborative initiative

- (A) We were a lead investor in one or more focus entities (e.g. investee companies)
- (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)
- (C) We publicly endorsed the initiative

(3) Provide further detail on your participation in this collaborative initiative

The Alliance is comprised of over 200 institutional investors, including asset management firms, trade union funds, public pension funds and foundations representing a total of over US\$12 trillion in assets under management and 19 countries.

Over the years, Storebrand has been involved in different working groups and initiatives within the alliance.
In 2022, we were mainly involved in three initiatives: one on working conditions in supply chains with a strong focus on forced labour within the textile, ICT and energy sectors; an initiative on digital rights engaging with the Information and Communication Technologies sectors as well as one on conflict-affected and high-risk areas (CAHRAs) with a cross sectorial approach. The main general asks from the alliance to companies are to conduct human rights due diligence in their own operations and their supply chains, thereby encouraging companies to identify, assess, avoid and mitigate risks of human rights violations by implementing policies and practices in areas such as traceability, risk assessment and procurement.

(D) Initiative #4

(1) Name of the initiative	Investor Initiative on Hazardous Chemicals (IIHC)
(2) Indicate how your organisation contributed to this collaborative initiative	<p>(A) We were a lead investor in one or more focus entities (e.g. investee companies)</p> <p>(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)</p> <p>(C) We publicly endorsed the initiative</p> <p>(E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support</p>
(3) Provide further detail on your participation in this collaborative initiative	<p>The Investor Initiative on Hazardous Chemicals (IIHC) was started by Storebrand together with Aviva Investors, to tackle the chemical sector's approach to the risks of hazardous chemicals. By the end of 2022, IIHC included than 50 asset managers with US\$ 11 trillion in assets under management. IIHC engages chemical companies, specifically asking that they: increase transparency by disclosing the identity and production volumes of all hazardous chemicals produced globally; publish time-bound phase-out plans of persistent chemicals; and work to improve their rankings on the ChemScore chemical sustainability metric and share information with Chemsec, the organization that assesses it.</p>

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☒ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☒ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- ☒ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (H) We did not verify the information submitted in our PRI report this reporting year

THIRD-PARTY EXTERNAL ASSURANCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 2	CORE	OO 21, CBM 1	N/A	PUBLIC	Third-party external assurance	6

For which responsible investment processes and/or data did your organisation conduct third-party external assurance?

- ☒ (A) Policy, governance and strategy
 - Select from dropdown list:
 - ☐ (1) Data assured
 - ☐ (2) Processes assured
 - ☒ (3) Processes and data assured
- ☒ (C) Listed equity
 - Select from dropdown list:
 - ☐ (1) Data assured
 - ☐ (2) Processes assured
 - ☒ (3) Processes and data assured
- ☒ (D) Fixed income
 - Select from dropdown list:
 - ☐ (1) Data assured

- (2) Processes assured
- **(3) Processes and data assured**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 3	PLUS	CBM 1	N/A	PUBLIC	Third-party external assurance	6

Provide details of the third-party external assurance process regarding the information submitted in your PRI report.

(1) Description of the third-party external assurance process

From auditor's statement by PwC in Storebrand ASA's Annual Report 2023, p 175-176:

"We have examined whether Storebrand has developed a GRI Index for 2023 and whether mandatory disclosures are presented according to the Standards published by the Global Reporting Initiative 2021. (...) We have complied with the independence and ethics requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA Rules), and we have fulfilled our other ethical obligations in accordance with these requirements. (...) We conducted our work in accordance with the Standard on Assurance Engagements ISAE 3000: "Assurance engagements other than audits or review of historical financial information", issued by the International Auditing and Assurance Standards Board. (...) The procedures we performed were based on our professional judgment and an assessment of the risk of error, and included among others meetings with representatives from Storebrand who are responsible for the material sustainability topics covered by the sustainability reporting; review of internal control and routines for reporting key performance indicators for sustainability; obtaining and reviewing relevant information that supports the preparation of key performance indicators for sustainability; assessment of completeness and accuracy of key performance indicators for sustainability. (...) Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the information in the GRI index for 2023 and the defined key figures for performance indicators for sustainability as of 31 December 2023 is not, in all material respects, in accordance with the applicable criteria."

(2) Assurance standard(s) used by the third-party assurance provider

- ☐ (A) PAS 7341:2020
- ☒ **(B) ISAE 3000 and national standards based on this**
- ☐ (C) Dutch Standard 3810N (Assurance engagements regarding sustainability reports)
- ☐ (D) RevR6 (Assurance of Sustainability)
- ☐ (E) IDW AsS 821 (Assurance Standard for the Audit or Review of Reports on Sustainability Issues)
- ☐ (F) Accountability AA1000 Assurance Standard (AA1000AS)
- ☐ (G) IFC performance standards
- ☐ (H) SSAE 18 and SOC 1
- ☐ (I) Other national auditing/assurance standard with guidance on sustainability; specify:
- ☐ (J) Invest Europe Handbook of Professional Standards
- ☐ (K) ISAE 3402 Assurance Reports on Controls at a Service Organisation
- ☐ (L) AAF 01/20
- ☐ (M) AAF 01/06 Stewardship Supplement
- ☐ (N) ISO 26000 Social Responsibility
- ☐ (O) ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information
- ☐ (P) ASAE 3410 Assurance Engagements on Greenhouse Gas Statements
- ☐ (Q) PCAF
- ☐ (R) NGER audit framework (National Greenhouse and Energy Reporting)
- ☐ (S) Auditor's proprietary assurance framework for assuring RI-related information
- ☒ **(T) Other greenhouse gas emissions assurance standard; specify:**

The external audit of Storebrand's sustainability reporting includes assurance of compliance with GRI standards, including on GHG emissions (GRI standard 305)

(3) Third-party external assurance provider's report that contains the assurance conclusion

https://www.storebrand.no/en/investor-relations/annual-reports/_attachment/inline/356bc0b6-e4c5-496b-bb96-820365979d15:c7b2d6ec72e04cdc4c32afdc7de4198eebf3ccee/2023-annual-report-storbrand-asa.pdf

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

☒ **(A) Policy, governance and strategy**

Select from dropdown list:

- ☐ (1) Data internally audited
- ☐ (2) Processes internally audited
- ☒ **(3) Processes and data internally audited**

☒ **(C) Listed equity**

Select from dropdown list:

- ☐ (1) Data internally audited
- ☐ (2) Processes internally audited
- ☒ **(3) Processes and data internally audited**

☒ **(D) Fixed income**

Select from dropdown list:

- ☐ (1) Data internally audited
- ☐ (2) Processes internally audited
- ☒ **(3) Processes and data internally audited**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

Storebrand Asset Management has completed an internal audit on governance and processes for compliance with the SFDR. While this internal audit did not encompass all information submitted in the report to PRI, there are several points of overlap and findings will be used to improve areas covered by PRI reporting. The audit was completed in June 2023 and was distributed to the company board, and thereafter to the Risk committee in Storebrand ASA.

Approach: We have carried out an overall assessment of whether governance and procedures are updated to ensure compliance with the disclosure requirements under the SFDR. The focus has been on product level requirements related to the prospectus, website and periodic reporting.

Governance – The internal audit has assessed the quality of the framework and whether it facilitates for compliance with SFDR requirements in an effective manner.

Roles and responsibilities related to SFDR are also included.

Compliance with SFDR (product level) – We have conducted a walk-through to evaluate whether the process of developing information in the prospectus, on the web page and in periodic reporting ensures compliance with SFDR requirements:

Monitoring – Established control system regarding how the company monitors SFDR compliance has been reviewed. This includes system support and quality assurance of SFDR requirements. In addition, we have assessed whether the board receives relevant information.

Constraints:

The audit has only focused on the process related to the disclosure requirements of SFDR. Classification requirements from the EU Taxonomy have not been considered.

The audit is not an assessment of the investment process. The audit focuses on how SFDR requirements are taken into considered in the process.

In addition, key staff from all relevant business areas were involved in quality assurance of data and processes reported to the PRI.

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

☐ (A) Board, trustees, or equivalent

☒ (B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

☒ (1) the entire report

☐ (2) selected sections of the report

☐ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year