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Skandia Fonder – Policy for Responsible Investment

Adopted by	The Board of Directors of Skandia Fonder AB
Date adopted	2023-10-04
Supersedes	Skandia Fonder's Corporate Governance Policy adopted 2022-05-19
Applies for	Skandia Fonder AB
Policy Owner	CEO
Legal or other basis	Commission Delegated Regulation (EU) no. 231/2013, Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, The Swedish Mutual Funds Act (Swe. lagen (2004:46) om värdepappersfonder), The Alternative Investment Fund Managers Act (Swe. lagen (2013:561) om förvaltare av alternativa investeringsfonder), FFFS 2013:9 and FFFS 2013:10

The information above is not included in the Board's decision and may thereby be amended without the Board's input. Such changes may only be made by Group Compliance. However, the Policy Owner is designated by the CEO.



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1 Background and purpose

Skandia Fonder AB ("Skandia Fonder" or "The Company") is a wholly owned subsidiary of the Skandia Group. Skandia Fonder manages funds and alternative investment funds. The capital in each fund is jointly owned by the fund unit holders represented by Skandia Fonder. To be responsible and active as an owner is an important part of the mandate from the unit holders, where the objective is to create sustainable long term return by a sound risk taking and by promoting sustainability factors..

The purpose of this policy is to establish the Company's policy for responsible investments, where the Company's principles for shareholder engagement constitute an important part. The policy also aims to meet unit holders' sustainability expectations for how their capital in the Company's funds is invested. The policy forms the basis for how Skandia Fonder analyzes, evaluates and manages the sustainability risks of investments and the potentially negative consequences of our investments for sustainability factors. The policy also describes how Skandia Fonder, through management in line with the Paris Agreement, that investors can, and given the Company's operations, can promote society's objective for sustainable development.

Companies that conduct operations in accordance with the Securities Funds Act Lag (2004:46) om värdepappersfonder) ("LVF") or the Alternative Investment Funds Managers Act (Lag (2013:561) om förvaltare av alternativa investeringsfonder) ("LAIF") are required to adopt internal rules for shareholder engagement. Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related information (SFDR) regulates, among other things, what information the financial services sector must provide to investors. Other regulations that are of importance to Skandia Fonders's work with responsible investments are the Swedish Code for fund companies, Guidelines for fund companies' marketing and Guidelines for the fund companies' shareholder engagement issued by the Fund Companies Association. The guidelines also consider the principles adopted by the European Association of Funds and Investment Managers, EFAMA.

Skandia supports the UN Principles for Responsible Investment, the UN PRI (Principles for Responsible Investment) and the UN Global Compact, a UN initiative for responsible business, on which Skandia Fonder's work on responsible investment is based.

Skandia Fonder's policy for Responsible Investment has been adopted by the Board of Directors of Skandia Fonder, which also regularly reviews the policy. The CEO of Skandia Fonder is the contact person for matters regarding responsible investments and corporate governance. This policy is public and is published on Skandia.se/fonder.

2 Skandia Fonder's role as owner and investor

In all its operations regarding the management of the funds, fund companies shall act exclusively in the mutual interest of the unit holders. In other words, other interests of, for example, Skandia Fonder or related companies must give way to any conflicts of interest. This means that Skandia Fonder will act in ownership matters or as an investor with the aim of achieving the best possible return for the unit holders in accordance with the Fund's investment guidelines, sustainability profile, goals and risk profile. The work takes into account, among other things, Skandia Fonder's role and influence as owner and how Skandia Fonder through investments has a positive or negative impact on sustainability factors depending on sustainability profile.

This policy covers all of Skandia Fonder's funds and the application is adapted to each fund's sustainability profile and investment guideline, which are set out in more detail in each fund's fund regulations and information brochure (prospectus).

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For each fund there are fund regulations that are approved by the Swedish Financial Supervisory Authority. The fund regulations specify, among other things, how the funds may be invested. Furthermore, it follows from the Securities Funds Act (2004: 46) that a fund company must not exercise significant influence over the management of a stock market company. The capital in each fund is jointly owned by the fund unit holders and they can redeem their fund shares at short notice. Thus, situations may arise where Skandia Fonder has a choice between actively promoting change in a stock market company or selling the shares. It is part of Skandia Fonder's mission to assess which option best suits the interests of the unit holders.

The funds hold shares in Swedish and foreign stock market companies. For these investments, Skandia Fonder is often a minority owner and then generally has a lower degree of direct influence over the companies. However, we see that it is possible to influence companies in a sustainable direction through dialogues with the companies' managements. We conduct the dialogues either ourselves or in collaboration with other owners, depending on what we believe gives the best effect. Furthermore, the funds have holdings in interest-bearing securities issued by issuers such as states, municipalities, housing institutions, companies, etc. For these assets, Skandia Fonder has an interest as an owner and holder of the issuer's debt instruments, nd generally has a lower degree of influence.

The funds also have less indirect holdings in equities via external funds and derivative instruments. In these cases, Skandia Fonder has a financial exposure but no direct ownership of the underlying instruments and thus an overall lower degree of influence. However, we can exercise influence over the fund manager. However, in these situations, Skandia Fonder also tries to exercise active ownership and find products with an acceptable sustainability profile.

In the alternative investment funds, ownership is related to funds that own unlisted limited companies, direct investments in unlisted limited companies and corporate loans. For these investments, Skandia Fonder is usually a minority owner and thus in general lower degree of direct influence on the companies. However, we see that it is possible that we can influence through dialogues with the companies' managements. We conduct the dialogues either ourselves or in collaboration with other owners, depending on what we believe gives the best effect

The different types of investments and their forms can also have different degrees of positive or negative consequences for sustainability factors. Partly in the underlying investment object, partly depending on the form of the funds' investments, which is exemplified below.

Investments that involve a company, or other type of issuer, being provided with share capital or credit financing, which are then used to finance the issuer's operations, have the potential to have a direct impact on sustainability. Bond issues, corporate loans and share issues are examples where the issuer is often provided with financing. The impact on sustainability factors can be particularly clear in cases where the financing is earmarked for a specific investment project within the issuer or where the issuer's main activities are characterized by a positive or negative sustainability profile.

When an investment is made through a transaction that results in a certain financial instrument changing hands without the issuer to whom the instrument relates being provided with financing, such an investment usually does not have a significant impact on sustainability factors. Investments in listed shares via stock exchanges or bonds on the secondary market and certain financial derivatives are such examples. When many investors act in a similar way, for example for sustainability reasons, such buy or sell transactions can affect the liquidity of the financial instrument and, by extension, also the issuer's general access to financing opportunities. Which investments that Skandia Fonder selects or opts out of for reasons of sustainability also has a signal value to our customers and other stakeholders. Our assessments above are guided by established international analytical frameworks for measuring the sustainability impact of investments. The basis for Skandia Fonder's actions is always an assessment of the conditions for achieving a result that ultimately benefits the unit holders in the Company's funds.



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Regardless of the asset class or whether the funds' holdings are directly or indirectly, Skandia Fonder intends to promote sustainable value creation in all the funds' investments. However, the prerequisites for a result vary both with the size of ownership and with the degree of influence that the asset class enables.

3 Objective of Skandia Fonder's responsible innvestment

Skandia Fonder believes that environmental, social or corporate governance factors can pose both opportunities and financial risks, which the Company has an ambition to integrate into its investment decisions. Skandia Fonder's ambition is that the companies and other investments in which Skandia Fonder has ownership interests should be able to manage the risks and opportunities with sustainable considerations and responsible business in order to promote good returns. This includes companies and other issuers' risks and opportunities in relation to climate change.

Skandia Fonder directs the work with responsible investments to certain specific themes with the aim of specifically promoting some or all of the UN's 17 global sustainability goals for example in climate, environment and health. This also includes developing the Company's management and investments to contribute to the Paris Agreements objective¹. Skandia Fonder's ambition is to be a role model in the work with sustainability, and we see responsible investments as an important part of that work.

Skandia Fonder's fund offering include funds that have extended sustainability criteria ("funds with sustainability focus"). In these funds, sustainability factors are crucial when taking investment decisions.

4 Skandia Fonders management practices of responsible investment

Skandia Fonder analyzes and identifies the material sustainability factors of the investments and how they should be taken into account in order to manage the investments' sustainability risks and return opportunities. We then apply, among other things, a self-developed analysis model that takes into account from a sustainability perspective what companies produce and how they conduct their business. We then also assess the potential positive or negative sustainability consequences of our investments. These assessments then form the basis for how we act in our investment strategy by selecting, deselecting and influencing investments based on sustainability factors. We strive for a continuous development of how our management analyzes and considers sustainability risks and sustainability factors.

4.1 Opting In

Skandia Fonder is of the opinion that long-term returns are promoted by actively selecting investments that in various ways contribute to sustainable development. The starting point is that all investments, regardless of asset class, must act responsibly and strive to deal with potential negative consequences within their operations. In addition, Skandia Fonder rewards companies that integrate environmental, social and business ethics factors into their operations in an efficient and value-creating manner, as well as business models that promote sustainable development. This applies in particular to companies that contribute to climate change in line with the Paris Agreement². We are looking for ongoing investments that contribute to solutions with a measurable positive impact on sustainability factors

¹ The Paris Agreement, <u>https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement</u>

² S.k. omställningsbolag



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4.2 Opting Out

Through its positions in sections 5.2 and 5.3, Skandia Fonder defines a number of activities and behaviors that are not considered to be in line with responsible entrepreneurship and sustainable value creation. These are selected in accordance with the fund's sustainability level. The decision to opt out of these types of investments helps to manage financial sustainability risks that are related to the activities of those sectors and reduces the potential negative consequences of such investments for sustainability factors such as climate and health. In cases where we have indirect ownership through investments in external funds and financial index derivatives, we work to ensure that their investments take sustainability factors into account in line with Skandia Fonder's policy for responsible investments. The basis for Skandia Fonder's actions is always an assessment of the conditions for achieving a result that ultimately benefits Skandia Fonder's shareholders.

4.3 Engagement

Skandia Fonder's ambition is to conduct active and relevant advocacy work to promote that companies in which we have ownership interests are aligned with Skandia Fonder's expectations of sustainable value creation. Skandia Fonder's opportunities to influence a company in a sustainable direction vary based on the form of ownership and influence that Skandia Fonder has vis-à-vis the company, which is described in section 2. Any measures are affected both by how much influence the ownership allows and the nature of the holding and other circumstances.

In dialogue with the companies, Skandia Fonder wants to influence them to rectify any shortcomings in the sustainability work and improve their preventive work with the environment, social aspects, business ethics and corporate governance. The companies' boards must also work actively with the sustainability issues that are relevant to the companies.

If a company has deviated from Skandia Fonder's sustainability criteria in accordance with this policy, Skandia Fonder must exercise active ownership in order to persuade the company to develop its operations. This means, for example, that Skandia Fonder must closely monitor the development of events in the company, hold dialogues with the companies' management and, where applicable, make its voice heard at general meetings.

Skandia can also engage in dialogue directly with the underlying companies in external funds or financial derivatives, often in connection with other investors.

5 Skandia's positions on sustainability factors and application in the investment strategy

Based on our aims and objectives with responsible investments, we have identified and expressed a number of positions that develop Skandia's views on various material sustainability factors, our expectations of the companies and other issuers in which we invest, and how those assessments are applied in our investment strategy opts out and affects investments.

5.1 Skandia Fonder's expectations on how companies will act

Skandia supports the UN Principles for Responsible Investment, UN PRI and the UN Global Compact, a UN initiative for responsible business, on which Skandia Fonder's corporate governance is based.



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At Skandia Fonder, this work is conducted at two levels - at a basic level in funds that invest responsibly and at an increased level in funds with extended sustainability criteria.

5.1.1 Funds investing responsibly

Companies shall take reasonability for humans, the environment and have good corporate governance. They should also operate in accordance with a sustainability reporting standard and adhere to the principles of the following codes:

- The UN Global Compact •
- The OECD's guidelines for multinational companies, including •
- The UN Guiding Principles on Business and Human Rights •
- TCFD (Task Force on Climate-related Financial Disclosures), which is an international initiative • that aims to promote society's climate change by working for companies and other actors to make clear climate-related financial information about their activities available.

These frameworks and guidelines are based on international conventions, amongst these:

- The UN Convention on the Rights of the Child
- The UN's Universal Declaration of Human Rights .
- The ILO Core Conventions •
- Conventions for combating bribery and corruption •
- International environmental conventions •

Skandia Fonder expects companies to comply with these international guidelines and conventions even if they do not target states or NGOs, whether or not the countries in which the companies operate is bound by the codes and conventions and even if the countries have less extensive legislation on the subject. Skandia Fonder also wants companies to act exemplarily on the sustainability issues.

Skandia Fonder regularly reviews the fund's holdings. If it comes to our knowledge that a company does not follow these conventions in a way that is satisfying to Skandia Fonder, an evaluation of the deviation shall be performed. Preferably Skandia Fonder will have a dialogue with such a company in the aim of encouraging it to correct the unsatisfying conditions, which will be documented by Skandia Fonder. Ultimately, in cases where a sufficient improvement is judged to be unlikely, a company may be excluded as an investment. Such decision is taken by the CEO of Skandia Fonder.

More on Skandia Fonder's standpoint regarding human rights, working conditions, the environment, the climate and work ethics can be found on Skandia's website (www.skandia.se/fonder)

5.1.2 Funds with extended sustainability criteria

Skandia Fonder's criteria for extended exclusions of norm violations are based on information that establishes that a serious violation of international guidelines and conventions has occurred and that the company has not taken adequate measures to rectify the violation. In this case, the company is excluded as an investment object from funds with extended sustainability criteria. Such decision is taken by the CEO of Skandia Fonder.

5.2 Skandia Fonder's position on sectors with sustainability risk

In addition to the positions taken above, Skandia Fonder excludes investments in companies in specific sectors. Skandia Fonder believes that the companies that are excluded have a business concept that is not in line with sustainable development. The decision to opt out of these types of investments contributes



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to the management of financial sustainability risks that are related to the activities of those sectors. Furthermore, this contributes to the investment running a reduced risk of such investments' potential negative consequences for sustainability factors relating to, for example, climate and health.

At Skandia Fonder, this work is conducted at two levels - at a basic level in funds that invest responsibly and at an increased level in funds with extended sustainability criteria.

Skandia Fonder's positions regarding certain sectors with sustainability risks and excluded companies can be found on Skandia Fonder's website (<u>www.skandia.se/fonder</u>).

In cases where the Fund's holdings are indirect, exclusions in accordance with this policy cannot always be guaranteed. Skandia Fonder is however working on finding a solution for this.

5.2.1 Funds investing responsibly

• **Tobacco:** In view of the negative health effects, Skandia Fonder does not invest in companies that produce tobacco.

• Controversial weapons:

- Skandia Fonder does not invest in companies that develop, produce, maintain or distribute components or systems specifically developed for nuclear weapons, cluster weapons, land mines, chemical weapons or biological weapons, in accordance with the respective UN convention for each product group³.
- **Fossil Fuels:** Skandia Fonder does not invest in companies whose revenue to 5 percent or more come from coal mining for energy purposes. Skandia Fonder's goal is to gradually also reduce exposure to investment companies that extract oil and gas, as well as power producers with a high proportion of fossil fuels in their energy mix. We then gradually opt out of companies that do not show sufficient willingness or ability to reorganize their operations in line with the goals of the Paris Agreement.
- **Cannabis:** Skandia Fonder does not invest in companies whose revenue to 5 percent or more come from the production or distribution of cannabis for recreational use. Furthermore, Skandia Fonder has a restrictive attitude to companies involved in cannabis for medical use. Skandia Fonder's position is based on the fact that cannabis use risks leading to abuse or addiction with negative health effects as a result.

5.2.2 Funds with extended sustainability criteria

In addition to the above sectors, investments in the sectors below are excluded in funds with extended sustainability criteria.

• **Conventional weapons:** Companies whose revenue to 5 percent or more derive from the production or development of conventional weapons and companies whose revenue to 25 percent or more derives from the production or development of products/services with military application.

³ UN Convention on Cluster Munitions (Oslo, 2010),

The UN Convention on the Prohibition of the Use, Storage, Production and Transfer of Anti-personnel Mines (Troop Mines) (Ottawa, 1999), the UN banning the development, manufacture and storage of bacteriological (biological) and toxin weapons and their destruction (London, Moscow and Washington, 1975)

The Chemical Weapons Convention of 1997)



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Fossil fuels: Companies whose revenue to 5 percent or more derive from extraction, refining or power generation of fossil fuels (defined as coal, oil, gas) and companies whose revenue to 50 percent or more derive from supporting technology and services to extract fossil fuels.

Deviation from exclusions in companies with revenues from fossil fuels can be acceptable if a company qualify as a transition company. A transition company has a distinct commitment in line with global warming of no more than 2°C, an energy mix that largely consists of renewable sources or a carbon dioxide intensity aligned with the Paris Agreement's climate scenarios.

5.3 Skandia Fonder's position on governments' management of fundamental sustainability factors

Skandia Fonder excludes investments in government bonds issued by governments that do not conform with fundamental democratic principles, that systematically and seriously violate human rights, or where corruption is widespread at a central level. Skandia Fonder's exclusions are based on official sources, including the Swedish Government Offices' sanctions list.

Skandia Fonder's standpoint regarding governments' management of fundamental sustainability issues and excluded governments can be found on Skandia Fonder's website (www.skandia.se/fonder).

5.4 Skandia Fonder in dialogue

4.1.1 Equities and debt instruments

In dialogue with the companies, Skandia Fonder wants to influence them to rectify any shortcomings in the sustainability work and to improve their preventive work with the environment, social aspects, business ethics and corporate governance. The companies' boards also work actively with the sustainability issues that are relevant to the companies.

4.1.2 Indirect Holdinas

In cases where Skandia Fonder has ownership interests in companies through investment funds, we address any deficiencies in the companies 'and other issuers' sustainability work with the fund's managers in order to develop the manager's processes to identify and manage sustainability-related risks and opportunities in the management. Our dialogues with asset managers also aim to encourage them to adopt a proactive approach to integrating sustainability aspects into management.

5.5 Skandia Fonder's corporate governance in listed companies

Skandia Fonder believes that self-regulation of the Swedish stock market is a good foundation for developing the stock market. It is particularly important to contribute to maintaining respect for stock market companies' decision-making structures, with distinct differences between the owners', board's and management's duties and functions, and to safeguard the board's collective decision-making model.

Skandia Fonder complies with the Swedish Corporate Governance Code ("the Code"), which governs Skandia Fonder's actions in relation to stock market companies. The Code is built upon the "comply or explain" principle, which entails that a company may deviate from specific rules if it provides an explanation of the reasons for the deviation. This means that Skandia Fonder may encourage and support wellgrounded deviations from the Code. Each individual company shall by itself develop and be responsible for the best operating model that works best for the company. Skandia Fonder shall contribute to the further development of the Code in a manner that is favourable for stock market companies. Furthermore,



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Skandia Fonder also complies with the Swedish Investment Fund Association's "Swedish Code of Conduct for Fund Management Companies" and "Guidelines for investment fund managers ownership influence".

The points below shall be seen as a complement to, or standpoint within the framework of, the Code's rules. Skandia Fonder's principles for shareholder engagement are explained in more detail on Skandia Fonder's website (www.skandia.se/fonder).

5.5.1 Nomination Committees and board nominations

A well-functioning board recruitment process is an important part of the corporate governance work and Skandia participates in the work of the Nomination Committee's in companies where the holding so justifies. Skandia Fonder recommends that the Annual General Meeting normally indicate the criteria on which the nomination committee's members are to be appointed. A Nomination Committee that reflects the actual ownership in the company is preferable over one whose members are elected at the Annual General Meeting. The chairman of the Board should not be a member of the Nomination Committee, unless he is a representative of the owner. Instead, the chairman of the board should be adjunct to the Nomination Committee's meetings in the situations it deems appropriate. A constituted Nomination Committee shall serve until the next nomination committee has been appointed.

The Board of Director's Audit Committee shall assist the Nomination Committee largely when framing proposals for the auditor's election. Skandia Fonder is of the opinion that the process of choosing the Audit services should be approved by the Nomination Committee and that they should have the opportunity to meet the Audits.

Board members should own stock in the company. The board is elected according to the shareholders' mandate. All board matters shall be handled based on the perspective of the existing ownership structure.

If an employee of Skandia Fonder is nominated as a member of the board of a listed company, the nomination shall be approved by Skandia Fonder's Board of Directors.

5.5.2 Incentive programmes

Skandia Fonder is of the opinion that all incentive programmes shall be designed in such a manner that they are reasonable, that they steer towards clear and transparently reported targets, and that they are optimised to coincide with the shareholders' interests. Any dilution shall be compared with other forms of compensation. Incentive programmes shall be designed in such manner that the company's interest is mutual to the shareholder's.

5.5.3 Issues and issue mandates

Skandia Fonder is of the opinion that a general meeting should only in exceptional cases grant general issue mandates to the board, and to a limited extent. Offset issue mandates shall include a clear statement of purpose and recipient. It is especially important that the board ensures that use of such benefits the existing owners. For new issues in stock market companies, existing owners should have preference. Deviation from this principle should be made only in the most exceptional cases and shall then be specifically explained.

5.5.4 Bids and acquisitions

In bidding situations, the board shall act from the existing owners' perspective through the entire process. Further, the board shall gain assurances that the bidder does not pledge any commitments to the management or board before the existing owners have accepted the offer. Even if a company owns shares



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with different voting power, in a bid situation the principle of equal treatment shall apply, i.e., Skandia Fonder is of the opinion that no bid premium shall exist for different share classes. The principle one share, one vote is preferable.

5.6 Vote at general meetings

When Skandia Fonder exercises its voting right at a general meeting, the investors' best interest shall be put first. This means that participation in the voting may not favour any other party or individual investor to the disadvantage of other investors.

When Skandia Fonder exercises voting rights at general meetings, the person representing the funds is instructed on how to vote. After the meeting, the outcome is reported to Skandia Fonder where it is documented.

Skandia Fonder exercises voting rights in the following cases:

a. Skandia Fonder's funds own a total of more than 1% of the company's market value.

b. The company constitutes one of the ten largest holdings in Skandia Fonder's funds (in total).

c. By special decision, e.g. motivated by the fact that Skandia Fonder considers that the company has violated Skandia Fonder's rules on corporate governance.

Skandia Fonder monitors relevant corporate events and general meetings of the companies through assignments to third parties (both within and outside the Skandia Group). Analysis of AGM proposals and the like is performed by both Skandia Fonder and third parties (both within and outside the Skandia Group).

5.7 Skandia Fonders ownership in debt instruments

Skandia may also have ownership interests in limited companies through investments in debt instruments. In case of changes in, for example, the companies' capital structure and major operational changes, Skandia Fonder can exercise its rights granted by the terms in the loan agreement and by working for an active ownership influence to ensure long-term values.

5.8 Collaboration with others

Skandia Fonder is a relatively small owner of the aggregate capital in Sweden and internationally. Therefore, the opportunity to influence, in most cases, will be greatest through collaboration with other owners. Skandia Fonder shall collaborate with other shareholders if Skandia Fonder believes that it benefits the Funds' unit holders and that it promotes effective exercise of ownership.



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5.9 Conflicts of Interest

The rules governing corporate governance for companies operating according to LVF and LAIF are formulated differently, but the basic idea is the same - the shareholders are represented by Skandia Fonder in all matters relating to a fund managed by Skandia Fonder. In this regard, Skandia Fonder shall act exclusively in the interests of the funds and unit holders. This means that Skandia Fonder will act in ownership matters with the aim of achieving the best possible return for the unit owners in accordance with the Fund's investment orientation, goals and risk profile. In other words, other interests of, for example, Skandia Fonder or related companies must give way to any conflicts of interest.

Skandia Fonder has an ongoing process for identifying and managing conflicts of interest, which means that the Company ensures that unit holders are not disadvantaged at the expense of other stakeholders.

Skandia Foundation's Board of Directors has adopted special internal rules for handling conflicts of interest.

6 Information on the application of the policy

Skandia Fonder informs how this policy is applied and how we handle sustainability factors and sustainability risks in our management practice.. The effects of the work of applying the policy must be measured, followed up and reported regularly. The methods for this must be appropriate and developed gradually to meet regulatory requirements and our own ambitions for transparency. The information is available on Skandia Fonder's website. (www.skandia.se/fonder), among other things in, the funds' information brochures, annual reports, annual report of impact including how we exercised our shareholder engagement. Part of the work with responsible investments is described in Skandia's annual sustainability report.