



## 1. Objective

The objectives of the Responsible Investment Policy (the “**Policy**”) are to establish and communicate the approach of Danske Bank Group to responsible investments and to ensure adherence to internal governance, applicable laws, and endorsed external standards while addressing the preferences of our customers and managing the fiduciary duties we owe to our customers.

The Responsible Investment Policy is a cornerstone of Danske Bank’s ambitions to integrate sustainability into core businesses, and it supports our vision to be recognised as a leading Nordic asset manager within the area of responsible investments. When customers entrust us with their assets and savings for investment, it is our duty to serve our customers’ best interests by providing investment solutions that aim to deliver competitive and long-term performance. An integral part of this duty is investing responsibly and to manufacture investment products that align with customers’ preferences. As a responsible investor, we are therefore mindful of not only how investment performance is affected by Sustainability Factors, but also the impact on society that our investments may cause.

The Policy is incorporated and elaborated upon in Danske Bank’s [Sustainability Risk Integration Instruction](#), [Exclusion Instruction](#), [Inclusion Instruction](#) and [Active Ownership Instruction](#) with supporting Guidelines and our [Principal Adverse Impacts Statement](#) (manufacturer statement).

## 2. Definitions

The definitions for the terms used throughout this Policy are available in Appendix 1.

## 3. Scope and target group

The Policy covers investment activities relating to assets managed by Danske Bank on behalf of customers through investment products, such as discretionary mandates, managed portfolios, alternative investment funds, insurance-based investment products (IBIPs), pension products/schemes, and UCITS funds<sup>1</sup>. The Policy does not cover structured products or derivatives manufactured by Danske Bank or other Danske Bank capital market activities (including but not limited to market making, securities trading etc.).

Externally managed investment products distributed to Danske Bank’s customers, but not wrapped in a Danske Bank investment product, are also not covered by the Policy. Considerations related to distribution of responsible investment product offerings are governed by the Treating Customer’s Fairly Policy of Danske Bank and the Product Governance Instruction for Investment Products.

The Policy applies to all employees, all functions, and all units in Danske Bank that perform asset/investment management activities as outlined herein. The Policy applies to In-Scope Subsidiaries once adopted appropriately by their relevant governing bodies.

<sup>1</sup> There might be deviations in relation to specific investments such as derivatives, illiquid alternatives, and externally managed funds that our managed investments products are invested into due to their specific features. Such processes are outlined in supporting Instructions and Guidelines.



#### 4. Danske Bank's Approach to Responsible Investments

***At Danske Bank, responsible investments play a key role when we invest our customers' assets through managed investment products. Danske Bank's approach to responsible investments is based on the principle of Double Materiality.***

As a responsible investment manager, we are mindful of not only how Sustainability Factors impact investment performance (**Financial Materiality**) but also how our investments may have positive and/or negative impacts on society (**Environmental and Social Materiality**). We refer to this as "Double Materiality" considerations. We believe that attentiveness to these sustainability dimensions when investing is a cornerstone of our fiduciary duty to create value for customers and to create a responsible investment product offering for our customers that supports the transition to a more sustainable society. Based on what is relevant for a specific asset class and investment strategy, these Double Materiality considerations can be addressed through **Inclusion, Exclusions** and **Active Ownership**.

We disclose our approach to responsible investments and report on our efforts to be transparent and support accountability of our investment processes and activities. We also report on our progress through the initiatives we have signed up for such as the UN-supported Principles for Responsible Investment (UN PRI).

The aim is to communicate such that our customers and stakeholders can find answers to relevant questions on our investment processes and activities in a clear and accessible way. The information is published on our sustainability-related disclosure websites and, whenever relevant, disclosed and reported directly to customers and other stakeholders.

Where appropriate and allowed per applicable law, we collaborate with peers, like-minded investors and other relevant parties, to reduce negative and maximise positive impact on Sustainability Factors. We also welcome an open dialogue with our stakeholders and value the opportunity to collaborate, where relevant. We participate in investor initiatives that aim to increase transparency and sustainability standards in companies and financial markets, such as the CDP, International Sustainability Standards Board (ISSB) including the Sustainability Accounting Standards Board (SASB), the Institutional Investors Group on Climate Change (IIGC), the Paris Pledge for Action, the Net-Zero Asset Owner Alliance, the Net Zero Asset Managers Initiative, the Emerging Markets Investor Alliance (EMIA), and UN PRI<sup>2</sup>.

#### **Principle 1: We aim to protect the value of investments and generate attractive returns**

***As a part of our fiduciary duties to customers, we are committed to identify negative risk exposures with a financial impact on investments. This implies a duty to systematically identify Sustainability Factors that may pose a risk of causing material negative impact to the value of an investment (Sustainability Risk) and integrating considerations of such factors into our investment products.***

For a Sustainability Factor to be considered financially material, it needs to have the potential to translate into investment performance and have a negative impact on either the revenue/expenses of the company, the value of its assets/liabilities or its cost of capital. By analysing Sustainability Factors in conjunction with other financial factors, it is possible to gain greater insights into the investments and thereby identify Sustainability Risks and investment opportunities.

Financially material Sustainability Factors are unique to each investment and are determined by, for instance, business activities, industry categorisation and domicile. Sustainability Risk exposures should be well managed and, as needed, lead to and/or influence a decision to either buy/increase weighting, hold/maintain weighting, decrease weighting, or sell/divest or to engage through our Active Ownership activities. The proper management of Sustainability Risks can be challenged by several factors, including lack of comprehensive and stand-

<sup>2</sup> As further set-out in Appendix 2.



ardised data and the fact that Sustainability Risk factors often are complex, multidisciplinary and interlinked, which can make them difficult to assess in their entirety.

Appreciating that investments have different characteristics and are affected differently by Sustainability Factors, the investment teams tailor the analysis of Sustainability Factors to the specific investment strategy and asset class.

Further information on how we identify, manage and control Sustainability Risks is outlined in our [Sustainability Risk Integration Instruction](#), [Inclusion Instruction](#), [Exclusion Instruction](#) and [Active Ownership Instruction](#).

## **Principle 2: We aim to analyse and assess the impacts that investments may have on the environment and other societal dimensions**

*We aim to analyse and assess the negative impacts and positive contribution of our investments and to address these aspects in accordance with the preferences of our customers. As one of the largest financial institutions in the Nordic countries, Danske Bank has the ability to be part of solutions to the challenges our planet and societies are facing, including through the investment opportunities we offer to our customers. We support the goals of achieving net zero by 2050 in line with ambitions of the Paris Agreement.*

### **Principal Adverse Impacts**

Negative impacts on Sustainability Factors from investments are referred to as “**Principal Adverse Impacts**”. Such impacts can materialise through activities and practices that are harmful to society such as, but not limited to, activities with high carbon emissions, activities in the fossil fuel sector, substantial waste levels, lack of gender diversity, breaches of human rights and lack of company policies to avoid corruption and bribery. We prioritise the management of these impacts through the strategy commitments of the investment products that we manufacture that are developed to align with the preferences of our customers and the overall responsible investment approach of Danske Bank.

Principal Adverse Impacts are identified through our screening of Environmental and Social Materiality. Our screening focuses on a core set of universal mandatory indicators that always lead to Principal Adverse Impacts and additional selected voluntary indicators (see current full list of the Principal Adverse Impact indicators that we consider in our [Principal Adverse Impact Statement](#)).

We work from the belief that by measuring and reporting the Principal Adverse Impacts of our portfolios, we are best positioned to monitor and steer the overall sustainability performance of our portfolios. The voluntary indicators are selected and kept updated on basis of considerations of relevance to our investment management philosophy, exposures as well as data quality and coverage for the indicators.

The management and the prioritisation of Principal Adverse Impacts are defined by the investment strategy of our investment portfolios/activities. Subject to the investment strategy, Principal Adverse Impact considerations may lead to or influence decision-making to either buy/increase weighting, hold/maintain weighting, decrease weighting, or sell/divest. As a minimum standard, Principal Adverse Impacts are managed through **Exclusions**. This may be supplemented by other approaches such as **Active Ownership** and **Inclusion** that further address the impacts.

As an organisation, Danske Bank reports on Principal Adverse Impacts that have been measured on an annual basis, and we also strive to report on Principal Adverse Impact on the majority of our responsible investment product offerings. Further information on how we identify, manage and control Principal Adverse Impacts is outlined in our [Principal Adverse Impact Statement](#), [Exclusion Instruction](#), [Inclusion Instruction](#) and [Active Ownership Instruction](#).



### Positive Contribution

Positive contribution of investments can be identified through the screening of issuers/companies for activities with positive contribution to environmental or social objectives as well as investments with other positive attributes, including but not limited to, best-in-class operations, sound sustainability practices and sound environmental stewardship. The screening is based on criteria and thresholds set out in regulatory defined frameworks, such as the EU Taxonomy, market setting initiatives, own proprietary models and methodologies, and other defined sustainability indicators.

Investment strategies with positive contribution use **Inclusions** such as individual stock picking, tracking of climate indices or overall portfolio alignment.

### Responsible Investment Products

Danske Bank manufactures investment products with different levels of sustainability ambitions that enable the distribution of products designed to cater for different levels of preferences of customers. Notwithstanding sustainability ambitions, all investment products manufactured by Danske Bank take due account of Sustainability Risk dimensions.

For **investment products that promote environmental and/or social characteristics**, these characteristics and good governance practices are binding elements of the investment strategy and are managed in accordance with the frameworks defined through our [Inclusion Instruction](#), [Exclusion Instruction](#) and [Active Ownership Instruction](#). Information about such products is disclosed under Article 8 of the SFDR in accordance with the specific requirements herein. Products promoting environmental and/or social characteristics have varying degrees of sustainability related ambitions.

For **investment products that have Sustainable Investments as their objective**, the environmental and/or social objectives are equally binding elements of the investment strategy as further governed through the [Inclusion Instruction](#). The 'Do No Significant Harm' principle is applied following the regulatory requirements for such products. The assessment of Principal Adverse Impact is also added to this exercise. Information about such products is disclosed under Article 9 of the SFDR in accordance with the specific requirements herein.

For further information on how we incorporate considerations to adverse impacts and positive contribution in our individual responsible investment products, reference is made to the pre-contractual documentation and reporting for managed investment products.



## 5. Governance

Governance is key when it comes to ensuring an efficient execution of our Responsible Investment Policy.

Our governance structure sets clear roles and responsibilities. The Executive Leadership Team acts under the mandate of the Board of Directors and is responsible for operational execution through underlying instructions adopted by the Head of LC&I in Danske Bank. Effective oversight is delegated to the Responsible Investment Committee acting under the mandate of by and reporting to the Business Integrity Committee in Danske Bank. The Responsible Investment Committee and the ESG Integration Council guide the execution of the Responsible Investment Policy and underlying instructions.

## 6. Escalation

Where a breach or potential breach of this Policy has been identified, an Employee must notify the owner of the Policy. Where the breach is also defined as an event, this must be registered and categorised immediately in ORIS according to the Non-Financial Risk Event Escalation Instruction.

The owner of the Policy must report to the Executive Management on significant breaches to the Policy in accordance with the Non-Financial Risk Event Escalation Instruction.

## 7. Review

The Policy is managed by the Board of Directors. The Policy must be reviewed annually as a minimum. It is the responsibility of the Responsible Investment Team to ensure that the Policy is updated and approved. Group Compliance and Group Risk Management are required reviewers are required reviewers prior to the approval to challenge the governing information.

Danske Bank's Business Integrity Committee receives updates on the implementation of the Responsible Investment Policy annually from the Responsible Investment Team.

## 8. Change log

Date	Version number	Comments/changes
16 October 2020	Version 1.0	Policy created
2 February 2022	Version 2.0	Annual update. Update to definitions including inclusion of additional definitions. Refinement of scope. Removal of references to sustainability risk advisory. Clarification of processes supporting the design and manufacture of Investment and Investment Related Products that either promote Environmental and/or Social characteristics or that have Sustainable Investment as their objective.
12 December 2022	Version 3.0	Update to the structure to better reflect regulatory requirements and double materiality dimensions
December 2023	Version 4.0	Minor editorial updates
December 2024	Version 5.0	Editorial updates and specification of sections (updated with minor clarification to Appendix 2 on 28 February 2025 following approval)



## Appendix 1 - Definitions

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

<b>Active Ownership</b>	The use of rights and position of ownership to influence the activities or behaviour of investee companies based on financial and/or impact materiality considerations. Active ownership is exercised by taking an active interest as an investor in the investee companies' circumstances, development, and management, and by adopting a long-term focus in the company in accordance with the Shareholders Rights Directive II.
<b>Danske Bank, or the Bank</b>	Danske Bank A/S
<b>Do No Significant Harm</b>	A principle ensuring that neither environmental nor social objectives are significantly harmed when investing sustainably as measured against indicators on principal adverse impacts, minimum social and environmental safeguards and/or screening criteria defined by regulations.
<b>Double Materiality</b>	The determination of whether a sustainability factor is of relevance when investing from either the perspective of Financial Materiality and/or Environmental and Social Materiality.
<b>Environmental and Social materiality</b>	The inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors. Also referred to as "impact materiality".
<b>ESG</b>	Environmental, social and/or governance.
<b>Exclusions</b>	The exclusion of certain sectors, companies/issuers and activities from investments on the basis of defined criteria and thresholds or identified controversies, adverse sustainability impacts, or failure to meet minimum sustainability safeguards.
<b>Financial Materiality</b>	The outside-in impacts that sustainability factors may have on a company's/issuer's economic and financial activities throughout their entire value chain (both upstream and downstream), affecting the value (returns) of such activities.
<b>Danske Bank Group, or the Group</b>	Danske Bank A/S, its branches and subsidiaries.
<b>Inclusion</b>	The active inclusion of a company/issuer in investments on basis of sustainability-related considerations.
<b>Principal Adverse Impacts</b>	A principal adverse impact is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters.
<b>Principal Adverse Impacts Statement</b>	The Statement on Principal Adverse Impacts of Investment Decisions on Sustainability Factors of Danske Bank.
<b>SFDR</b>	Regulation (EU) 2019/2088 of the European Parliament and of the Council on Sustainability-Related Disclosures in the Financial Services Sector as supplemented by underlying delegated acts.
<b>Sustainability Factors</b>	Environmental, social and employee-related matters, respect for human rights, anti-corruption, and anti-bribery matters.



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**Sustainable Investment**

An investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy.

Or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations.

Or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

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**Sustainability Risks**

An environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment<sup>3</sup>.

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<sup>3</sup> Sustainability factors that impose a risk to Danske Bank are not covered by the term "sustainability risk" in this policy, but instead managed and defined in the Danske Bank Group Enterprise Risk Management (ERM) Policy.



## Appendix 2

A non-exhaustive list of the applicable sector regulations and standards that have been taken into account by the Responsible Investment Policy is available below:

Sectoral Regulations and Directives as implemented in local laws:

- Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II)
- Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS)
- Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 (AIFMD)
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (MiFID II)
- Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 regarding the encouragement of long-term shareholder engagement (Shareholders Rights Directive II)
- Regulation (EU) 2019/2088 of the European Parliament and Council on sustainability-related disclosures in the financial services sector (SFDR) and underlying delegated acts

External Standards and Commitments:

- UN Sustainable Development Goals (SDGs)
- UN Global Compact & UN Guiding Principles on Business and Human Rights
- UN Principles for Responsible Investment
- OECD Guidelines for Multinational Enterprises
- G20/OECD Principles of Corporate Governance
- Sustainability Accounting Standards Board (SASB)
- Net Zero Asset Managers Initiative & Net-Zero Asset Owners Alliance
- ISSB
- CDP (formerly Carbon Disclosure Project)
- Paris Pledge for Action
- Climate Action 100+
- The Partnership for Biodiversity Accounting Financials (PBAF) & The Partnership for Carbon Accounting Financials (PCAF)
- Science Based Targets Initiative
- Nature Action 100 & Finance for Biodiversity Pledge

The Danske Bank Group position statements<sup>4</sup>:

- Danske Bank Position Statement Agriculture
- Danske Bank Position Statement Climate Change
- Danske Bank Position Statement Fossil Fuels
- Danske Bank Position Statement Mining and Metals
- Danske Bank Position Statement Arms and Defence
- Danske Bank Position Statement Forestry
- Danske Bank Position Statement Human Rights

The Responsible Investment Policy is further to be read in the context of other Danske Bank Policy related commitments impacting processes on Inclusions, Exclusions and Active Ownership. This includes but is not limited to the Danske Bank Group Policy on Conflict of Interest<sup>5</sup>:

<sup>4</sup> See Danske Bank Group Sustainable Finance Policy & Position Statements: <https://danskebank.com/sustainability>

<sup>5</sup> This sentence has been added for clarification purposes, since the approval by the Board of Directors in December 2024.