

# Exclusion Instruction

## 1. Objective

This Instruction defines the framework for how we in Danske Bank integrate exclusions in our investment management processes on basis of sustainability-related considerations. Our approach to responsible investment is based on the principle of Double Materiality meaning that we therefore consider sustainability factors from the perspective of:

1. Financial Materiality: Protect the value of our investments and generate attractive returns
2. Environmental and Societal materiality: Reduce the negative impacts and maximize the positive impacts that our investments have on society.

The Instruction operationalises our general commitment to consider and prioritise the principal adverse impact that our investment decisions may have on society as enshrined by the Responsible Investment Policy.

While focussed on the Environmental and Societal materiality, the Instruction also works to protect the value of our clients' investments in that exclusions defined by this Instruction limit exposures to issuers negatively impacted by sustainability factors.

## 2. Definitions

The below definitions apply to the terms used throughout the Instruction. Any term not defined herein shall have the meaning ascribed to it in the Responsible Investment Policy.

|  |  |
|--|--|
| <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>ESG</b>   | environmental, social or governance  |
| <b>Environmental &amp; Social materiality (also referred to as "Impact Materiality")</b> | the inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors   |
| <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. |

## 3. Scope

The Instruction applies to investment management activities of Danske Bank as covered by the Responsible Investment Policy. Exclusions governed by this Instruction constitute environmental and/or social characteristics for Danske Bank investment products that apply relevant exclusions as binding elements in investment strategies.

All direct investments in instruments issued by issuers excluded per this Instruction (e.g. equity, bonds) are in scope of this Instruction. This also includes labelled sustainability bonds issued by excluded issuers. Affiliation to an excluded issuer does in principle not trigger an exclusion. Sovereign based exclusions can also capture other related issuers such as state-owned enterprises.

The Instruction does not apply to investments in derivatives such as index derivatives or other broad-based derivatives. Subject to the binding elements of a given investment product, indirect investments in issuers through underlying funds are in scope of this Instruction. Indirect exposures through funds managed by an external manager may be subject to exemptions as set out in this instruction.

Exclusions covered by this Instruction are supplemented by statutory restrictions/bans on investing in issuers targeted by

sanctions as governed through Danske Bank’s AML/CTF and Sanctions Policy.

**3.1. Target group**

This Instruction applies to all employees, functions, and units in Danske Bank Group that are involved in or oversee investment management activities. The Instruction is also applicable to any employee, function and/or units in Group subsidiaries if adopted and/or incorporated by the subsidiary in accordance with applicable governance rules.

**4. Exclusions**

For the investment products, we make available, we apply three different categories of exclusions aimed to reduce exposures to investments that respectively:

- are involved in activities and or with a conduct harmful to society;
- are involved in activities with negative climate impact; or
- are involved in non-ethical and/or controversial activities

Exclusions captured by these categories are outlined in the table, with the reservation that certain clients might requests to have specific exclusions added to their strategies not listed below. Whether and how an exclusion within any of the categories applies to an investment product is dependent on the strategy of the given product and set out in investment guidelines and pre-contractual disclosures.

**Activities and conduct harmful to society**

| Exclusion  | Definition   | Activity   | Criteria/threshold <sup>1</sup> | Data source  |
|--|--|--|---------------------------------|--|
| Enhanced sustainability standards (Norm-based screening) | Involvement in sustainability related controversies, practices, or other activities considered unacceptable in relations to norms and/or significant principal adverse impacts on sustainability factors. This includes issuers allegedly violating international norms as defined by, e.g. UN Global Compact, The International Bill of Human Rights, The OECD Guidelines for Multinational Enterprises, The UN Guiding Principles on Business and Human Rights, The Declaration on Fundamental Rights and Principles at Work.<br><br>See methodology paper <a href="#">esg-screening-in-investments.pdf</a> ( <a href="#">danskebank.com</a> ) | Incident-based and/or weak sustainability governance | Case-specific                   | Proprietary Model based on input from ESG Data Providers (ISS, MSCI, Sustainability, VerRisk MapleCroit), Investment Teams, Responsible Investment Team, Leading investors/ Nordic institutions, NGOs & Other stakeholders |

<sup>1</sup> Revenue threshold means maximum revenue percentage from activity and Yes/No refers to binary categories where no revenue threshold, and where 'Yes' means restriction in place.

Activities with negative climate impact

| Exclusion                          | Definition   | Activity                                     | Criteria/ threshold      | Data source    |
|------------------------------------|--|--|--------------------------|----------------|
| <b>Tar sands</b>                   | Tar sands, also known as oil sands or crude bitumen, or more technically bituminous sands, are a type of unconventional petroleum deposit. Oil sands are either loose sands or partially consolidated sandstone containing a naturally occurring mixture of sand, clay, and water, saturated with a dense and extremely viscous form of petroleum technically referred to as bitumen (or colloquially as tar due to its superficially similar appearance). | Surface mining (P)                           | 5% revenue               | ISS-ESG        |
|                                    |  | In-situ recovery (P)                         | 5% revenue               | ISS-ESG        |
| <b>Thermal coal</b>                | Thermal coal designates coal used by power plants and industrial steam boilers to produce electricity or process steam.<br>Coal extraction: Coal extraction refers to the process of mining/extracting coal from the surface of the ground or underground mines. Surface mining is also referred to as 'opencast' mining and underground mining as 'deep' mining.<br>Power generation: Generation of electricity using thermal coal as the energy source.  | Surface mining/"opencast mining" (P)         | 5% Revenue<br>5% Revenue | ISS-ESG        |
|                                    |  | Underground mining/"deep mining" (P)         | 5% Revenue<br>5% Revenue | ISS-ESG        |
|                                    |  | Power generation (D)                         | 5% Revenues              | ISS-ESG        |
| <b>Peat-fired power generation</b> | Peat is organic fuel consisting of spongy material formed by the partial decomposition of organic matter, primarily plant material, in wetlands.   | Power Generation (P)                         | 5% Revenues              | ISS-ESG        |
| <b>Fossil fuels</b>                | Fossil fuel, any of a class of hydrocarbon-containing materials of biological origin occurring within Earth's crust that can be used as a source of energy. Fossil fuels include coal, petroleum, natural gas, oil shales, bitumens, tar sands, and heavy oils.  | Exploration (P)                              | 5% Revenue               | Sustainalytics |
|                                    |  | Production (P)                               | 5% Revenue               | Sustainalytics |
|                                    |  | Refining (D)                                 | 5% Revenues              | Sustainalytics |
|                                    |  | Transportation (D)                           | 5% Revenue               | Sustainalytics |
|                                    |  | Storage (D)                                  | 5% Revenue               | Sustainalytics |
|                                    |  | Energy equipment & services <sup>2</sup> (U) | 5% Revenue               | Sustainalytics |

<sup>2</sup> Based on GICS industry group classification (101010)

### Non-ethical and/or controversial activities

| Exclusion                    | Definition  | Activity                           | Criteria/ threshold | Data source |
|------------------------------|---|------------------------------------|---------------------|-------------|
| <b>Controversial weapons</b> | <p>Controversial weapons include the following:</p> <ul style="list-style-type: none"> <li>• Anti-personnel mines</li> <li>• Biological weapons</li> <li>• Chemical weapons</li> <li>• Cluster munition</li> <li>• Nuclear weapons</li> <li>• Nuclear weapons outside the Non-Proliferation Treaty</li> <li>• Depleted uranium ammunition and armour</li> <li>• Incendiary weapons</li> <li>• White phosphorus weapons</li> </ul> <p>The weapons are considered controversial as their production and use are assessed to be in conflict with the prohibitions set out in international conventions and national financing prohibitions because of their discriminate effects and the disproportionate harm they cause.</p> | Production (P)                     | Yes                 | ISS-ESG     |
|                              |   | Maintenance (D)                    | Yes                 | ISS-ESG     |
|                              |   | Sale (D)                           | Yes                 | ISS-ESG     |
|                              |   | Prime Contracting (D)              | Yes                 | ISS-ESG     |
|                              |   | Key Sub-Contracting (U)            | Yes                 | ISS-ESG     |
|                              |   | Supplier of Key Components (U)     | Yes                 | ISS-ESG     |
|                              |   |                                    |                     |             |
| <b>Tobacco</b>               | <p>Tobacco products are products made entirely or partly of leaf tobacco as raw material, which are intended to be smoked, sucked, chewed or snuffed. Tobacco products are also electronic cigarettes and other 'Next-Generation-Products'.</p>   | Leaf growing (P)                   | 5% Revenue          | ISS-ESG     |
|                              |   | Harvesting (P)                     | 5% Revenue          | ISS-ESG     |
|                              |   | Curing (P)                         | 5% Revenue          | ISS-ESG     |
|                              |   | Leaf processing (P)                | 5% Revenue          | ISS-ESG     |
|                              |   | End-product manufacturers (D)      | 5% Revenue          | ISS-ESG     |
|                              |   | Value-added resellers (D) (VAR)    | 5% Revenue          | ISS-ESG     |
| <b>Alcohol</b>               | <p>Alcohol refers to alcoholic beverages with alcohol volume higher than 2,25%. Alcohol is a psychoactive drug that is the active ingredient in drinks such as beer, wine, and distilled spirits.</p>   | Wineyard owners & operators (P)    | 5% Revenue          | ISS-ESG     |
|                              |   | Brewing (P)                        | 5% Revenue          | ISS-ESG     |
|                              |   | Distilling (P)                     | 5% Revenue          | ISS-ESG     |
|                              |   | Fermenting (P)                     | 5% Revenue          | ISS-ESG     |
|                              |   | Nightclub-, bar-, & pub-chains (D) | 5% Revenue          | ISS-ESG     |
|                              |   | Liquor stores (D)                  | 5% Revenue          | ISS-ESG     |
|                              | Malt, barley, other commodity inputs (U)  | 5% Revenue                         | ISS-ESG             |             |

### Non-ethical and/or controversial activities

| Exclusion                 | Definition  | Activity  | Criteria/ threshold | Data source  |
|---------------------------|---|---|---------------------|--|
| <b>Gambling</b>           | Gambling refers to the wagering of money on a game or event such as sports, cards or dice games, gaming machines and lotteries. Gambling has historically taken place in physical venues but is now also taking place online.               | Betting operators (P)   | 5% Revenue          | ISS-ESG  |
|                           |   | Casinos (P)   | 5% Revenue          | ISS-ESG  |
|                           |   | Lotteries (P)   | 5% Revenue          | ISS-ESG  |
|                           |   | Gambling brokers (P)  | 5% Revenue          | ISS-ESG  |
|                           |   | End-product manufacturer (P)  | 5% Revenue          | ISS-ESG  |
|                           |   | Affiliates/Lead generation/performance marketing (D)  | 5% Revenue          | ISS-ESG  |
|                           |   | Integrated casino systems (U)   | 5% Revenue          | ISS-ESG  |
| <b>Military equipment</b> | Military equipment refers to equipment that have been developed, designed or modified for military use based on military specifications. It covers both combat equipment as well as other military equipment with non-lethal functionality. | Production of combat equipment (tanks, ammunition, missiles, etc.) (P)                                    | 5% Revenue          | ISS-ESG  |
|                           |   | Production of other military equipment (radar systems, surveillance vessels, military software, etc.) (P) | 5% Revenue          | ISS-ESG  |
|                           |   | Maintenance, repair and logistics (U)   | 5% Revenue          | ISS-ESG  |
|                           |   | Military equipment distribution (D)   | 5% Revenue          | ISS-ESG  |
| <b>Pornography</b>        | Adult Entertainment/ Pornography refers to explicit images of sexual behaviour that are intended to cause sexual excitement. This includes products labelled 'erotica', 'porn' or 'adult entertainment'.                                    | Production (P)  | 1% Revenue          | ISS-ESG  |
|                           |   | Broadcasting (P)  | 1% Revenue          | ISS-ESG  |
|                           |   | Distribution (D)  | 1% Revenue          | ISS-ESG  |
| <b>SPU</b>                | SPU refers to the exclusion list <sup>3</sup> maintained by Norges Bank Investment Management/Statens Pensjon Utland  | Multiple ESG criteria   | Case-specific       | Norges Bank Investment Management/Statens Pensjon Utland |

<sup>3</sup> Observation and exclusion of companies | Norges Bank Investment Management (nbim.no)

Exemptions to exclusions may be allowed for exclusion categories. Reasons for such exemptions can be for instance be transitional dimensions or fiduciary duty related aspects. Exemptions approved by the Responsible Investment Committee.

Multi-asset investment products leveraging external funds should to the extent possible not have exposure towards

excluded investments. From time-to-time there might be excluded investments in such products if an exemption for the specific investment in the product has been approved by the Responsible Investment Committee

For more information on exemptions, see [climate-restrictions-exemptions-march-2022.pdf](#) (danskebank.com).

## 5. Data sources

Data sources used for exclusions are assessed by the Responsible Investment team in Danske Bank on a continuous basis. The assessments include, but are not limited to, assessments on data coverage, data quality, methodology, costs, and other Danske Bank operational considerations.

The Responsible Investment team is responsible for selecting the data source most relevant to each exclusion category.

## 6. Governance

Any changes to exclusion lists impacting Danske Bank Asset Management or Danica Livspensionsaktieselskab are subject to approval by the Responsible Investment Committee, as represented through the Head of Danske Bank Asset Management and the Danica Chief Investment Officer.

The Responsible Investment Committee further endorses changes made to exclusion criteria on basis of advice from relevant functions with its effectiveness being subject to approval by the Head of LC&I, Danske Bank.

## 7. Implementation

Issuers are screened against the exclusions on an annual basis, unless a review is triggered by other events. For exclusions relating to enhanced sustainability standards and SPU, the reviews run at a quarterly basis.

A decision to exclude a company/issuer is implemented no later than on the first bank day of the second month following

a decision by the Responsible Investment Committee to exclude. Once implemented, investment teams have five working days to divest holdings.

If selling is not possible for liquidity reasons, divestments will be put on hold pending the opportunity to sell at a reasonable price, holdings will be sold.

## 8. Disclosures

The list of excluded issuers is maintained by the Responsible Investment team and is published on Danske Bank website. Equally information on such companies/issuers that are granted exemptions to exclusions and investments on watch lists are disclosed on websites.

The Responsible Investment Committee and the ESG Integration Council will annually receive an update on the implementation of this Exclusion Instruction.

## 9. Change Log

Data sources used for exclusions are assessed by the Responsible Investment team in Danske Bank on a continuous basis. The assessments include, but are not limited to, assessments on data coverage, data quality, methodology, costs, and other Danske Bank operational considerations.

The Responsible Investment team is responsible for selecting the data source most relevant to each exclusion category.

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| Date            | Version number | Comments/changes    |
|-----------------|----------------|---------------------|
| 01 October 2022 | Version 1.0    | Instruction created |

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