27 June 2025

Active Ownership Report 2024

Danske Bank

* The report has been updated and republished with a correction to the reference on the scope of the report.

Active Ownership Report



When customers entrust us with their assets and savings, it is our duty to serve their interests by providing investment solutions with the goal of delivering competitive and long-term performance. Our firm commitment to **Responsible Investment** is an integral part of this duty. It is about making better-informed investment decisions – addressing issues of risk, problems, and dilemmas, and influencing our investments through active ownership. The exercise of active ownership activities is in line with our **fiduciary duty**, which is to consider what is in the best interests of our customers.



Active ownership - through direct dialogue, collaborative engagement and where relevant, through voting at general meetings - is an important part of our ability to create long-term value in our investments and to our investors. Our approach is based on the belief that exercising Active Ownership, in certain situations, can facilitate the resolution of challenging issues more effectively than the imposition of exclusions and/or divesting. By remaining invested and engaging, we believe that we are better positioned to influence companies and other issuers to properly manage sustainability-related risks, reduce negative impacts and/or maximise their positive impact on the environment or other societal dimensions, while monitoring their financial performance and management of financial risks.



The aim of our **Active Ownership Report** covering three parts '**Engagement**', '**Voting**' and '**Collaborative Initiatives**' is to demonstrate how our Active Ownership Instruction has been implemented throughout the year, fulfilling our annual duty to report on our active ownership activities in accordance with Article 3g of the Shareholder Rights Directive II (as implemented under national laws, including the Danish Financial Business Act § 101a.



For the purpose of this report, Asset Management covers and represents the assets under management of Danske Bank A/S, Danske Invest Management A/S, Danske Invest Asset Management AS and Danske invest Fund Management Ltd. As outlined under the Active Ownership Instruction, the report includes engagement activities carried out by external managers that are responsible for managing sub-delegated strategies and segregated mandates on behalf of Danske Bank. Danske Private Equity A/S is not covered by this report due to the specific nature of their investments.

The 3 parts of the report



Part 1 -Engagement



Part 2 – Voting



Part 3 – Collaborative Initiatives

Glossary

Active Ownership	The use of rights and position of ownership to influence the activities or behaviour of investee companies and other issuers 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 line with, for instance, the EFAMA Stewardship Code and the Shareholder Rights Directive II
Danske Bank or the Bank	Danske Bank A/S
Engagement	Refers to the interactions between the investor and current or potential issuers (which may be companies, governments, agencies, municipalities, etc.) on sustainability, governance or other topics tied to the issuer. Engagements may be undertaken to influence (or identify the need to influence) sustainability practices and/or seek information on the sustainable and financial performance of the issuer. Danske Bank exercises individual engagement or in collaboration with other investors and organisations. Engagements are registered and tracked through a centralised application, which is maintained by the Responsible Investment team. Engagements registered in the centralised application platform are classified under Danske Bank's engagement topics taxonomy
Environmental and Social materiality	The inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors
ESG	Environmental, social and/or governance
Financial Materiality	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
Danske Bank Group or the Group	Danske Bank A/S, its branches and its subsidiaries
Principal Adverse Impacts	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
Proxy Voting Advisor	A proxy voting advisor provides research, analysis and corresponding services to support investors in the execution of votes at the general meetings of companies
Responsible Investment Policy	The Responsible Investment Policy for Danske Bank
Sustainability factors	Environmental, social and employee-related matters, respect for human rights, anti-corruption and anti-bribery matters
Sustainability risk	An environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment
Voting	Refers to the exercise of ownership rights at General Meetings of companies where we own shares. Voting is carried out on management and/or shareholder resolutions to approve or disapprove of corporate governance as well as relevant environmental and social matters. Voting is exercised by ourselves or by proxy

Where to get additional information?



Responsible Investment Policy

click here



Voting Guidelines

click here



Management of Conflicts of Interest in Active Ownership <u>click here</u>



Principal Adverse Impact Statement

click here



Active Ownership Instruction click here



Engagement Guidelines

click here



Proxy Voting Dashboard

click here



Climate Progress Report 2024 click here

Our active ownership activities in numbers for 2024

2,462Engagement Interactions

3,294Meetings Voted

40,477 Proposals Voted

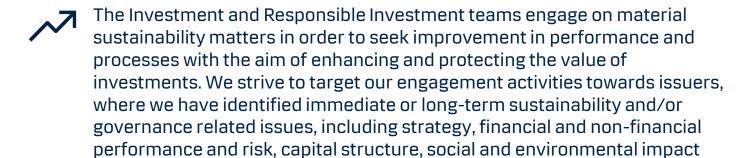
594Environmental And Social Proposals Voted

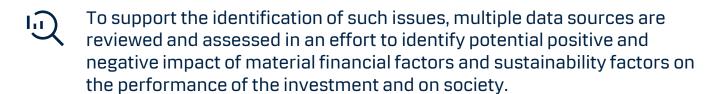


Part 1 Engagement

Introduction to Engagement Activities

and corporate governance.





In order to ensure a structured engagement process, we log and monitor company dialogues.

The following pages provide an overview and detailed insights on engagement activities carried out by ourselves and external managers that are responsible for managing sub-delegated strategies and segregated mandates on behalf of Danske Bank.



The breadth of engagement activities with corporates in 2024 are represented below

1,206Issuers

53
Domiciles

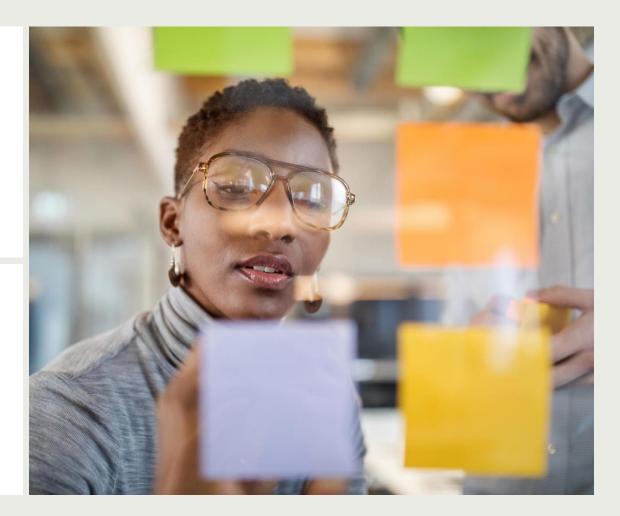








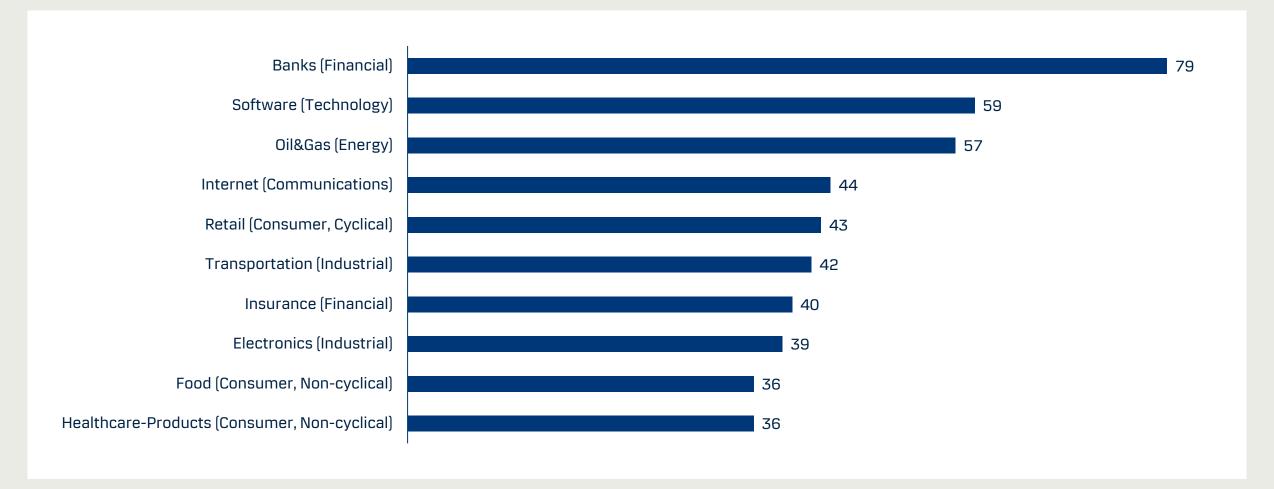
110 Engagement topics **2,415**Engagement Interactions



Top 10 industries

In 2024, we engaged with 1,206 companies.

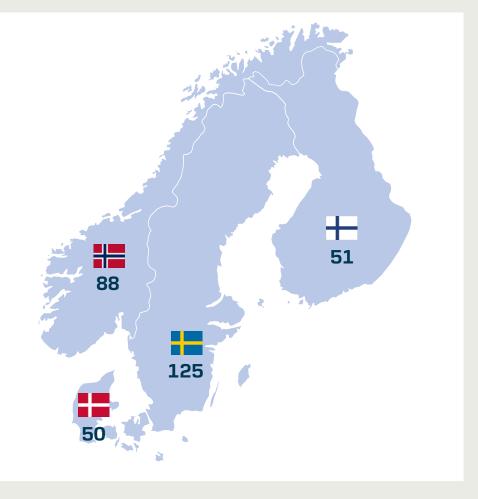
The following graph provides insights into the top 10 industries (sectors in brackets) that those companies operated in.



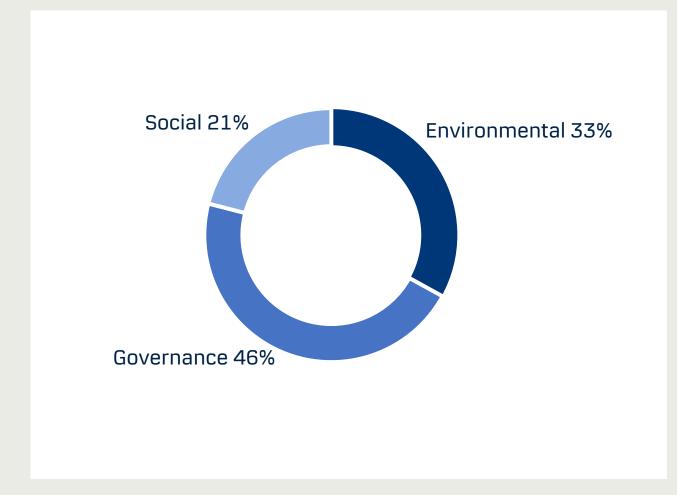


In 2024 we engaged with 1,206 companies that were domiciled across 53 countries. The table provides insights on the top country domiciles.

Rank	Country	Count of Companies
1	United States	408
2	Sweden	125
3	Japan	121
4	Norway	88
5	Finland	51
6	Denmark	50
7	China	44
8	United Kingdom	37
9	France	31
10	Australia	31



Split between engagement categories





Engagement activities are registered and tracked through a centralised application, which is maintained by the Responsible Investment team.



Engagements registered in the application platform are classified under Danske Bank's Engagement taxonomy. The topics included within the taxonomy are organized under three categories – Environmental, Social and Governance (ESG).



Presented on this page is an overview of the breakdown of total topics discussed, as organized under the ESG categorization.



Engagement interactions with companies may involve more than one ESG topic.

As such, below is a presentation of the most discussed topics when considering the total engagement interactions that were held in 2024.

E

Rank	Торіс	Count
1	Net Zero	263
2	GHG Emissions	257
3	Energy Management	209
4	Energy Transformation	127
5	Biodiversity	95
6	Water & Wastewater Management	52
7	Sustainable Products	45

S

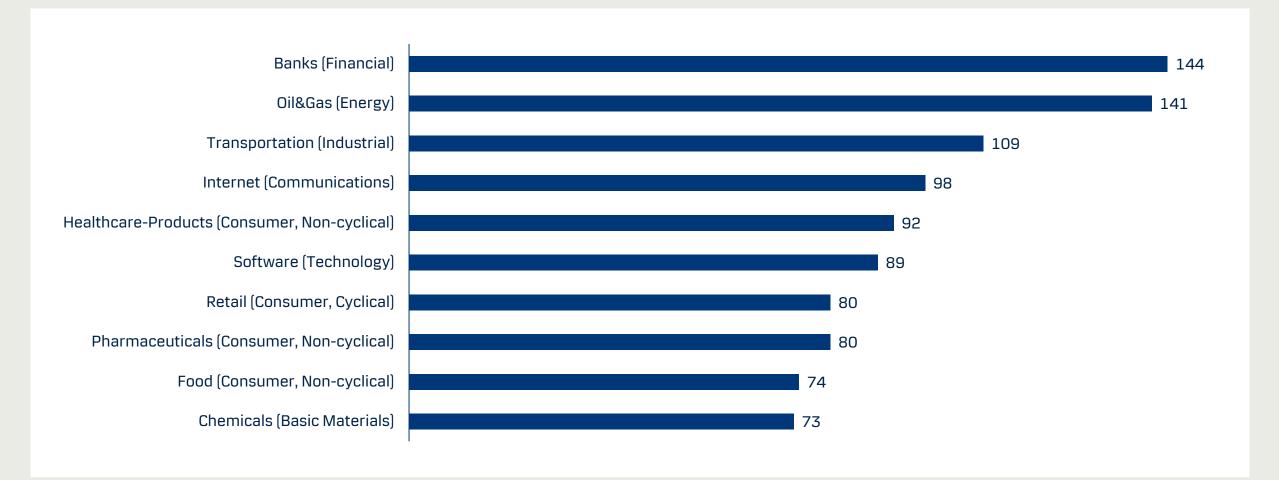
Rank	Торіс	Count
1	Employee Engagement, Diversity & Inclusion	128
2	Employee Retention	110
3	Human Rights & Community Relations	107
4	Labor Standards/ Practices	72
5	Employee Health & Safety	65
6	Data Security	59
7	Digitalisation	58

G

Rank	Topic	Count
1	Capital Structure	367
2	Board Composition	345
3	Executive Compensation	243
4	Corporate Governance	193
5	Dividends	130
6	M&A	105
7	Executive Composition	95

Top 10 industries most engaged with

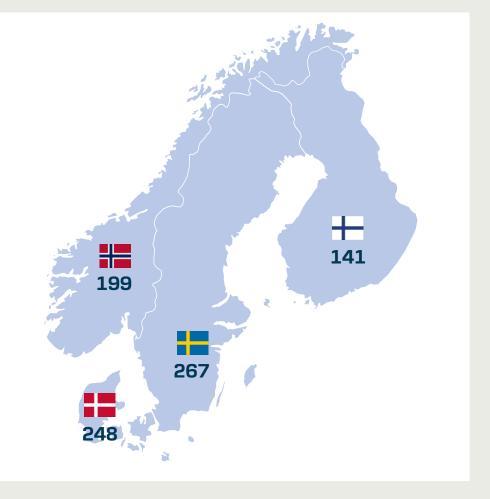
In 2024, we engaged with 1,206 companies. As engagement with these issuers can consist of numerous interactions. The following graph provides insights into the industries with which we had the greatest number of engagement interactions (Sector in bracket).



Engagement interactions as distributed across countries

Engagement with companies can consist of numerous interactions, below is a presentation of the top 10 domiciles, as categorised by the number of interactions that were held, and presentation of number of interactions held with issuers domiciled in the Nordics

Rank	Country	Count of Interactions
1	United States	728
2	Sweden	267
3	Denmark	248
4	Japan	210
5	Norway	199
6	Finland	141
7	United Kingdom	78
8	China	72
9	France	58
10	Switzerland	49



Engagement Categories per Interactions

Given the breadth of engagement activities, we approach and organise our engagement interactions across the following categories



Thematic Related

The focus of engagements in this category is on addressing systemic issues that multiple companies may be exposed to. Thematic engagements relate to Biodiversity & Nature, Net Zero Commitments (Largest Emitters Focus) and Human Rights.



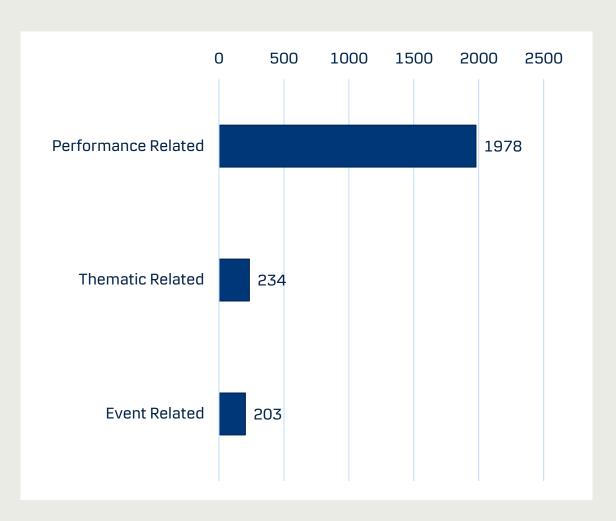
Event Related

Engagement carried out under this category identify issuers with negative operational performance and/or when a severe sustainability event has occurred suggesting that the issuer could implement specific measures to address the sustainability related issue.



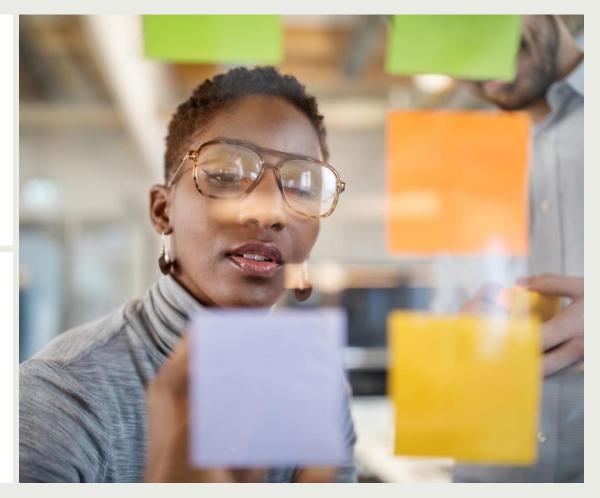
Performance Related

Continuous engagement with issuers is a fundamental part of our investment monitoring processes and supports us in gaining an indepth understanding of relevant matters pertaining to the issuer and provides an opportunity to communicate concerns, discuss governance issues, and advocate for responsible business practices.



The breadth of engagement activities with sovereigns and supranational entities in 2024 are represented below

25 23 Countries Issuers 18 Engagement Engagement Interactions topics

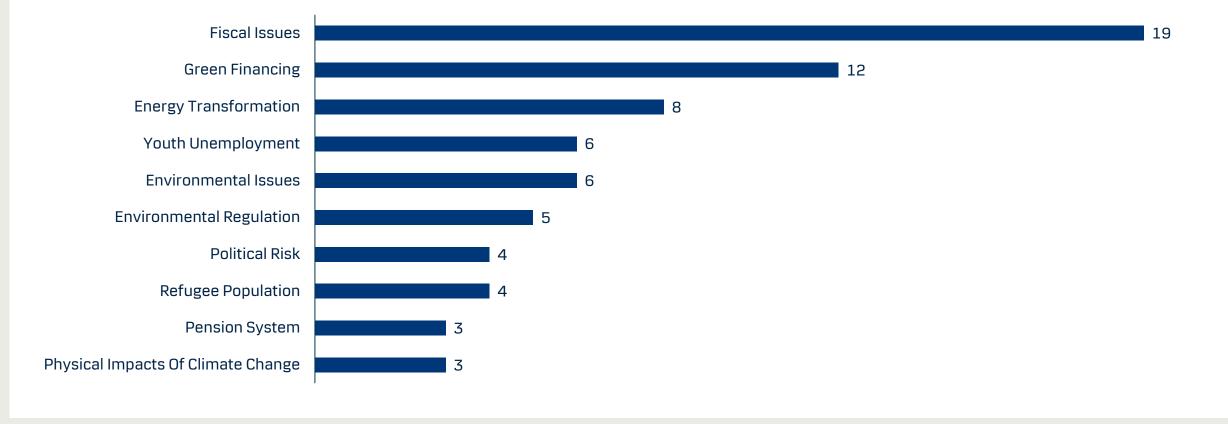




Sovereign and Supranational related engagements

In 2024, we have had 47 engagement interactions with 23 entities related to the management of strategies involving Sovereign issuers





Principal Adverse Impacts (PAIs)



Danske Bank considers principal adverse impacts of its investment decisions on sustainability factors. Active ownership is one strategy that may be exercised to manage principal adverse impacts.



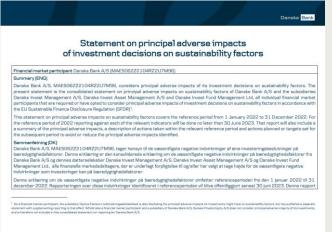
'Principal adverse impacts' means the negative, material or likely to be material effects on sustainability factors caused, compounded by or directly linked to our investment decisions.



Through the consideration of principal adverse impacts, Danske Bank is monitoring and reporting on 16 mandatory principal adverse impact indicators and six voluntary indicators defined by the Sustainable Finance Disclosure Regulation (SFDR). The aim is to address these impacts at different degrees on an investment product and entity level in order to reduce the negative footprint our investments have and/or may have on society. How and to what extent we consider and address principal adverse impacts will evolve over time. Information on how active ownership is utilised to mitigate principal adverse impacts is outlined in our Active Ownership Instruction.

Find information



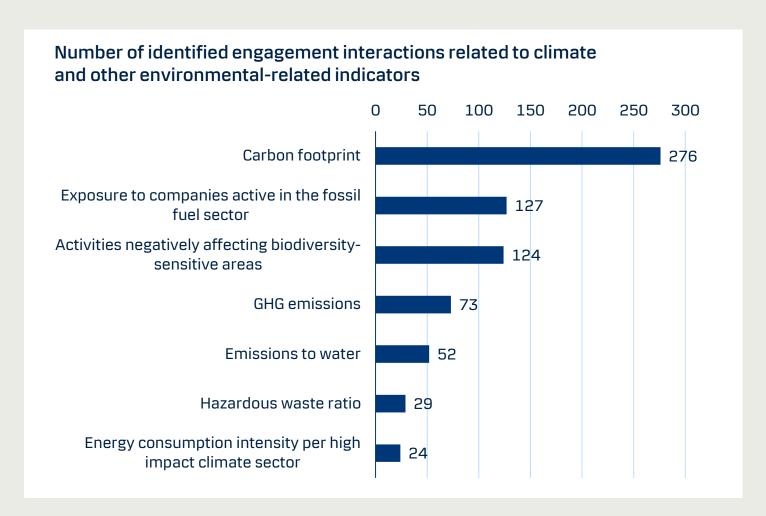


Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to environmental indicators that are within scope for Danske Bank's principal adverse impact monitoring and reporting

Climate and other environmental-related indicators

- Indicator 1. GHG emissions
- Indicator 2. Carbon footprint
- Indicator 3. GHG intensity of investee companies
- Indicator 4. Exposure to companies active in the fossil fuel sector
- · Indicator 5. Share of non-renewable energy
- Indicator 6. Energy consumption intensity per high impact climate sector
- Indicator 7. Activities negatively affecting biodiversity-sensitive areas
- Indicator 8. Emissions to water
- · Indicator 9. Hazardous waste ratio
- Indicator 19. Investments in companies without carbon reduction initiatives

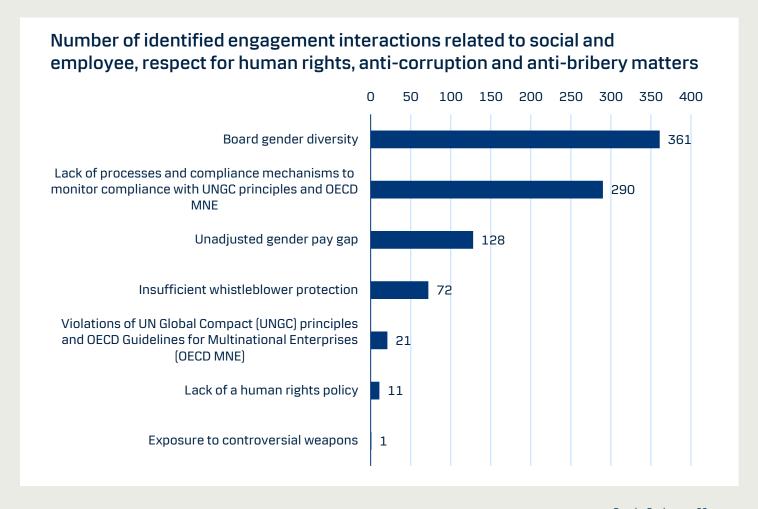


Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to social and employee matters indicators that are within scope for Danske Bank's principal adverse impact monitoring and reporting

Social and employee, respect for human rights, anti-corruption and anti-bribery matters

- Indicator 10. Violations of UN Global Compact (UNGC) principles and OECD Guidelines for Multinational Enterprises (OECD MNE)
- Indicator 11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD MNE
- Indicator 12. Unadjusted gender pay gap
- Indicator 13. Board gender diversity
- Indicator 14. Exposure to controversial weapons
- Indicator 20. Insufficient whistleblower protection
- Indicator 21. Lack of a human rights policy

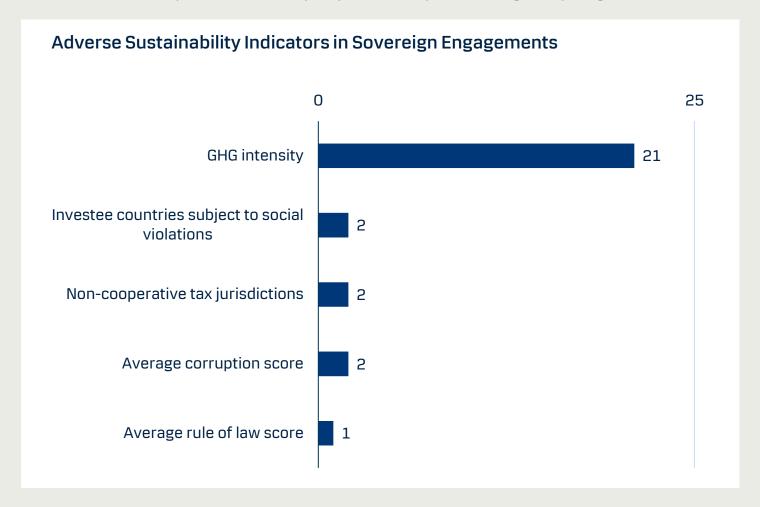


Principal Adverse Impact Monitoring and Reporting Scope for Sovereigns and Supranationals

Overview of engagement interactions that are assessed to be related to the indicators that are within scope for Danske Bank's principal adverse impact monitoring and reporting

Environmental, Social, Governance and Human Rights Indicators

- Indicator 15. GHG intensity
- Indicator 16. Investee countries subject to social violations
- Indicator 22. Average corruption score
- Indicator 23. Non-cooperative tax jurisdictions
- Indicator 24. Average rule of law score



Part 2 Voting

Introduction to Voting



The general meetings of companies are an opportunity to voice our opinion, vote on issues of key importance, and contribute to the good governance of the company. We seek to vote the shares held by our customers, where we are mandated to exercise voting, while taking into account preconditions, resources, and the costs of exercising voting rights.



In adherence with our Active Ownership Instruction, the Danske Bank Voting Guidelines provide a guide of how we anticipate voting on a given agenda item. The Guidelines are reviewed and updated on an annual basis to reflect market developments and to ensure that our commitments are duly integrated into our voting approach. As enshrined in our Active Ownership Instruction, voting is carried out in line with our assessment of what serves our clients best.

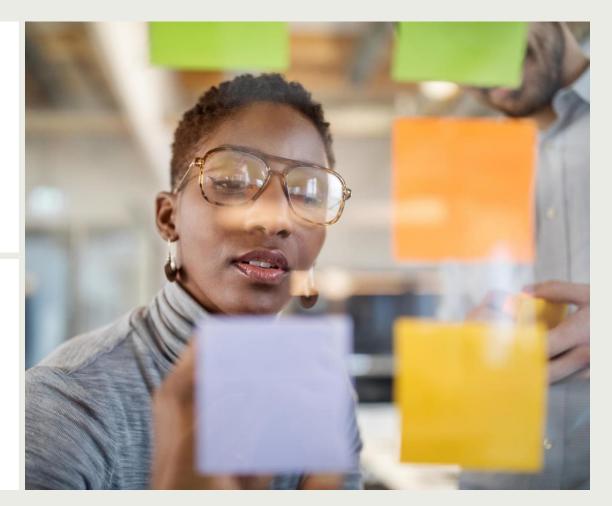


Records outlining our voting behaviour are made publicly available on our website.



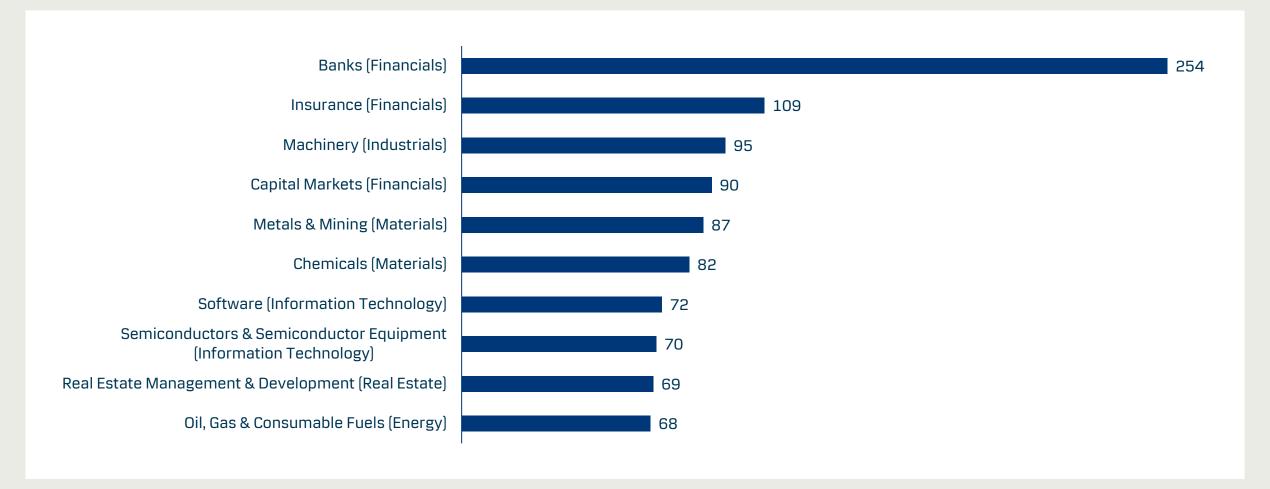
The breadth of voting activities in 2024 are represented below

2,576 64 Companies **Domiciles** 40,477 3,294 Meetings Proposals



Top 10 industries most voted

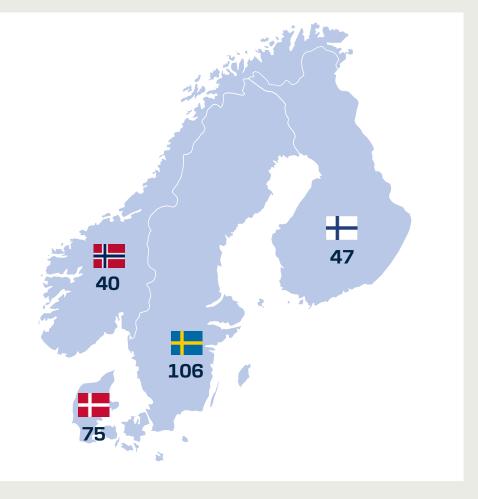
Number of companies per industry (Sector in bracket)





In 2024, we voted at the general meetings of 2,576 companies that were domiciled across 64 countries. The table provides insights on the top country domiciles.

Rank	Country	Count of Companies
1	United States	666
2	Japan	206
3	China	141
4	India	107
5	Sweden	106
6	Germany	100
7	France	88
8	United Kingdom	84
9	Taiwan	78
10	Denmark	75



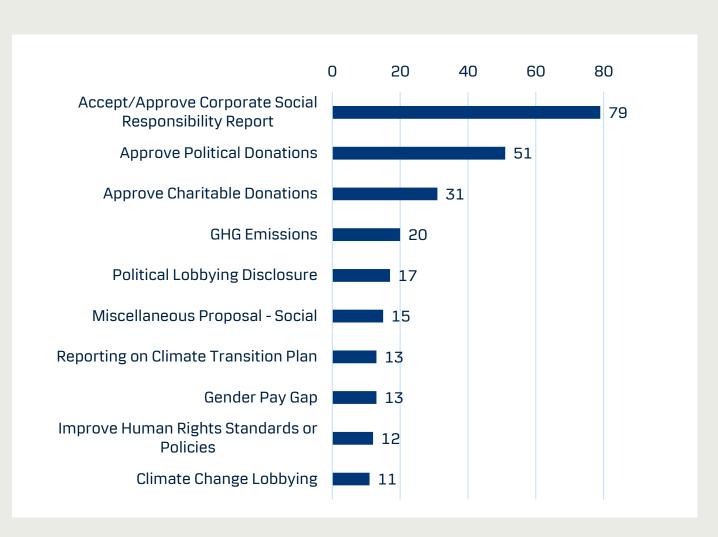
Most common Environmental & Social categorised proposal items voted 'For'

Observed Trends

Of the 40,477 tabled proposal items voted on in 2024, less than 1,5% (594) were categorized as environmental & social by our proxy provider. These included proposals filed by shareholder proponents that are not supportive of the integration of environmental and social considerations by businesses (also referenced as anti-ESG proponents).

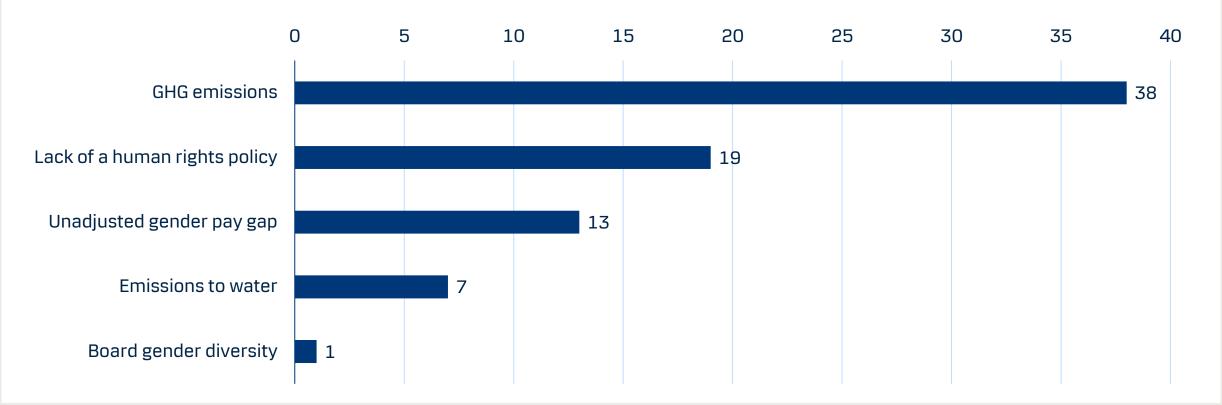
This notwithstanding, the most common themes amongst the 594 remained stable, with management proposals related to the approval of donations and non-financial information statements being the most prevalent. Climate-related proposals from shareholders were also common, often requesting increased disclosure and greenhouse gas emissions improvements. There was a rise in attention to biodiversity, climate and social issues. Biodiversity became a key concern, with proposals on responsible sourcing and construction near sensitive areas gaining traction. Climate initiatives expanded beyond oil and gas to industries such as steel and automotive, with increased scrutiny on corporate lobbying.

Social issues like living wages and freedom of association appeared more frequently on meeting agendas across companies, reflecting the systemic concerns being raised. Additionally, Al governance emerged as topic for boards to consider, urging companies to be transparent about risks related to its use.



In 2024, we have voted in support of proposals linked to Adverse Sustainability Indicators





More information on our voting activities?

View our votes

On our voting platform, we continuously disclose how we vote at the general meetings of holdings of significance

View our active ownership instruction

Our active ownership instruction sets out the principles guiding our voting scope through which we identify holdings of significance to vote on

View our voting guidelines

Our voting guidelines sets out a number of principles that guide how we vote on proposals at general meetings

Voting explained

As an asset manager, we use our voting rights to voice our opinion at the general meetings of companies we invest in. We vote on the proposals with the purpose of supporting companies in long-term value creation, mitigating sustainability-related risks and minimizing their prospective adverse impacts on society.

Danske Bank seeks to vote for all shares held by our customers, where we are mandated to exercise voting. However, our voting activities may be constrained by preconditions, resources, and the costs of exercising voting rights. This notwithstanding, through the application of our voting scope we have identified the holdings of significance that we will always seek to vote on.

Voting is done on a variety of management and shareholder resolutions, of which the majority targets corporate governance issues required under local listing requirements. As a guide for our voting activities and demonstration of transparency of our anticipated voting behaviour in the coming voting season Danske Bank has developed Voting Guidelines. The Guidelines are maintained and updated on an annual basis.

Our proxy advisor supports us with

- Notices of general meetings and comprehensive information about the companies, the voting items on the agenda and voting recommendations,
- · Voting recommendations based upon the Danske Bank Group's Voting Guidelines.

Voting is also conducted on proposals not specifically addressed by the Voting Guidelines, in which case we evaluate a proposal's likelihood of enhancing the long-term financial return or profitability of the company or maximizing long-term shareholder value.

Part 3 Collaborative Engagements

Collaborative Engagements introduction



When appropriate, Danske Bank collaborates with peers, like-minded investors and other relevant parties to exercise Active Ownership by engaging through joint dialogue and contributing collectively in respect to governance and sustainability dimensions. It might be appropriate to raise the issue with others in instances where Danske Bank's individual engagement may have proven to be unsuccessful.



Danske Bank participates in investor initiatives to encourage increased transparency and sustainability standards in companies and financial markets.



Cooperating with other stakeholders is not subject to any frequency targets and can be done on an *ad-hoc* basis or through formal investor networks or membership forums. Danske Bank's participation in collaborative engagements is undertaken with respect to and compliance of applicable competition laws, and Danske Bank's internal policies and guidelines relating to this.



Further information on our approach and governance of participation in collaborative initiatives is available in our Active Ownership Instruction.



Read more about the collaborative initiatives that we have joined

Find information



















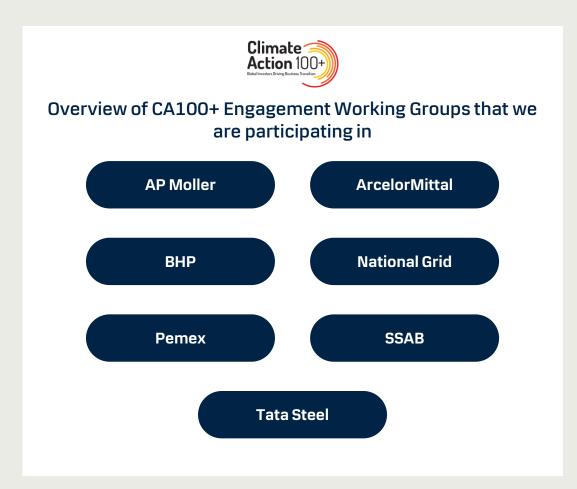






Overview of involvement in Climate Action 100+ activities

Climate Action 100+ (CA100+) is considered to be the largest ever global investor engagement initiative on climate change, which is focussed on the largest corporate greenhouse gas emitters. Further information is available in the link provided below.¹



In 2024 we joined seven collaborative engagements organised under CA100+. In addition, we voted in favour of approximately 57% (43) environmental and social proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.



¹ climateaction100.org Danske Bank 33

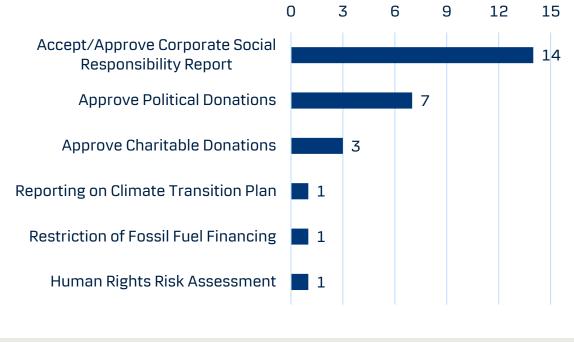
Overview of involvement in Institutional Investors Group on Climate Change Net Zero Engagement Initiative

The Net Zero Engagement Initiative (NZEI) is an investor led initiative aimed at aligning investment portfolios with a net zero pathway using corporate engagement. It focuses on major emitters beyond the Climate Action 100+ focus list. Further information is available in the link provided below.¹



In 2024 we participated in five collaborative engagements organised under the NZEI. In addition, we voted in favour of approximately 93% (27) environmental and social categorised proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.

0 3 6 9 12 15



1- iigcc.org/net-zero-engagement-initiative Danske Bank

Overview of involvement in Nature Action 100

Nature Action 100 is a global investor-led engagement initiative focused on supporting greater corporate ambition and action to reverse nature and biodiversity loss. Further information is available in the link provided below.¹



In 2024 we participated in three collaborative engagements organised under Nature Action 100. In addition, we voted in favour of approximately 54% (51) of environmental and social categorized proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.

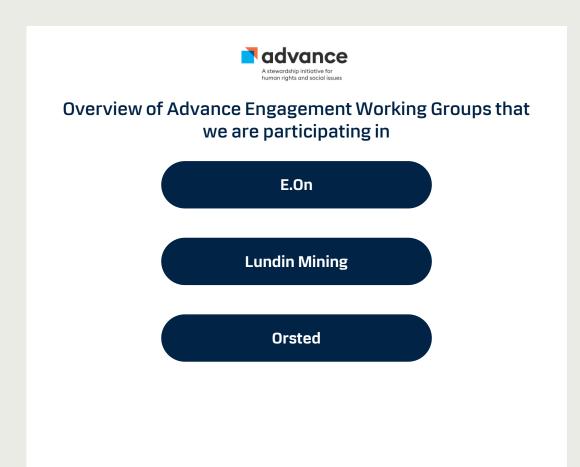


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¹. natureaction100.org Danske Bank

Overview of involvement in Principles for Responsible Investment's Advance

Advance is a PRI-led collaborative initiative where institutional investors aim to protect and enhance risk-adjusted returns by advancing progress on human rights through investor stewardship. Further information is available in the link provided below¹



In 2024 we participated in three collaborative engagements organised under PRI's Advance engagement initiative. In addition, we voted in favour of all nine environmental and social proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.



¹ unpri.org/investment-tools/stewardship/advance

Overview of involvement in FAIRR's collaborative engagement working groups

The FAIRR Initiative (FAIRR) is a collaborative investor network that raises awareness of the material risks and opportunities in the global food sector. Further information is available in the link provided below.¹



Biodiversity Loss from Waste & Pollution

Find information

Unpacking Labour Risk in Global Meat Supply Chains

Find information

Managing Biodiversity & Climate risks in Aquafeed

Find information



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