



Responsible Investment Report

Initiatives, Results and Active Ownership

Danske Bank Asset Management
April 2026

Danske Bank

About the report

The Responsible Investment Report (the "report") gives an update on the works and priorities for Danske Bank Asset Management within responsible investment in 2025. The chapter of this report relating to active ownership constitutes Danske Bank A/S' ("Danske Bank") annual disclosure pursuant to Section 101 a of the Danish Financial Business Act and covers engagement and voting tied to assets under management in Danske Bank Asset Management. Votes cast in respect of shares held by Danske Bank's subsidiary Danica Livsforsikringsaktieselskab ("Danica") are not included in this report.

While this report outlines the progress on our responsible investment efforts within Danske Bank Asset Management, the efforts are interrelated with other sustainability-related efforts and initiatives in the wider Danske Bank Group. To read more about Danske Bank's overall approach, please see the Sustainability Statement in Danske Bank's 2025 Annual Report. This report contains selected-reported principal adverse impacts (PAIs) for 2025 reported against certain mandatory PAI indicators as an average value for the year. Reporting against all mandatory PAI indicators and the optional indicators selected for Danske Bank will be available in the principal adverse impacts statement of Danske Bank that is to be published no later than 30 June 2026.

In relation to active ownership activities, reported numbers include the sum of all activities measured by end-of-year.

Reasonable care has been taken to ensure that the content is fair, true and not misleading. However, the report includes information that is subject to uncertainties stemming from limitations in underlying methodologies and data. Models and data sources used in preparing this report will continue to evolve, and we make no representation and no assurance to the likelihood of achievement, content's accuracy or completeness, including third-party information, and accepts no liability for any loss arising from relying on the information provided. The information in this report has not been independently verified.

No universally accepted framework (legal, regulatory, or others) currently exists in relation to sustainability-related data, information, and assessments. Investing globally in different asset classes, Danske Bank Asset Management strives to the extent possible to leverage primary reported data and information. Where such is not available, best efforts are made to obtain data, including data estimates, information, and assessments through third-party providers or directly from investee companies, and/or by carrying out additional research or making own reasonable assumptions/estimations. Sustainability-related data, information, and assessments are therefore not

comparable to that of financial information. This implies a risk of misrepresentation of data on sustainability-dimensions or impacts associated to investments reported. Despite diligent due diligence in the onboarding of data and other resource and cost proportional considerations in place to ensure the accuracy, completeness, and reliability of the data, it is not possible to verify nor guarantee, directly or indirectly, the complete correctness of the underlying data. Therefore, a certain margin of error is generally to be expected in relation to the underlying data.

Evolving methodologies also pose challenges for reporting accuracy, and updates to these may alter the conclusions presented, thereby causing descriptions, figures and charts in the report to become outdated. As market practices and data quality and availability develop, Danske Bank Asset Management may be required to update its methodologies or adjust its approach to ESG analysis, possibly amending, updating and recalculating its targets and assessments.

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Foreword

Our approach to sustainability starts with our customers and their preferences, and with our responsibility to manage risk and returns accordingly. This integrated approach to addressing sustainability considerations is part of our fiduciary duty as an asset manager.

When customers entrust us with their assets, our task is to deliver competitive long-term returns in line with their preferences. Sustainability factors increasingly influence both risks and returns, while investment decisions may also have broader implications. Our approach is therefore grounded in double materiality, providing a transparent and disciplined framework to assess financial relevance and societal impact.

The last few years' rising geopolitical tensions have reshaped Europe's sustainability agenda, increasing the focus on competitiveness, security and resilience alongside environmental and social considerations. These developments have challenged established assumptions and required a reassessment of how responsible investment principles are applied in practice, including within defence and energy-related sectors.

In response, we have adapted our responsible investment frameworks to reflect evolving customer preferences and market realities.

During the year, we expanded our investable universe to include approximately 30 companies previously excluded under the controversial weapons category. Over the past two years, updates to defence-related exclusion criteria have increased the investment universe for weapons and defence related exclusions by around 200 companies. These changes reflect a more nuanced understanding of security and resilience, while remaining anchored in clearly defined policies and customer expectations.

To meet growing demands, we launched the Danske Invest Defence & Security Fund* in October 2025, providing Nordic institutional and retail customers with access to the security and defence theme. While defence remains a relatively small segment of global equity markets, its macroeconomic relevance, including implications for public investment, growth and interest rates, has become increasingly important.

At the same time, we refined our approach to the energy transition. Our new methodology for investments in fossil fuel companies prioritises issuers with credible transition plans, reflecting a shift among many customers towards transition-focused strategies rather than broad exclusions. This approach acknowledges important trade-offs: exclusions reduce diversification and influence, while targeted inclusion combined with active ownership

can support risk management and long-term value creation.

Active ownership continues to be a core tool to protect long-term value and manage risks and impacts. In 2025, we recorded more than 1,200 engagement interactions with over 500 issuers across around 50 countries, complemented by extensive voting activity.

Education and transparency remain essential. As an example, customers need a clear understanding of how exclusions, inclusions and active ownership affect their portfolios, including implications for diversification, tracking error and expected returns. Strengthening internal capabilities and engaging openly with customers and stakeholders will therefore remain a priority.

As sustainability becomes more closely linked to competitiveness, security and capital allocation decisions, its relevance to asset management continues to evolve. Our approach is structured, adaptable and firmly grounded in customer needs. Our ambition remains unchanged: to deliver competitive returns responsibly, in line with the mandates and preferences we are entrusted to manage.



Christian Heiberg
Head of Asset Management

* *Investeringsforeningen, Danske Invest Defence & Security, Accumulating*
The fund is a Danish domiciled fund and is as such available for investors in Denmark. The fund is notified for marketing in Finland and Sweden.

Key initiatives 2025

In 2025, Danske Bank Asset Management responded to evolving customer needs and shifting geopolitical landscapes by launching several initiatives aimed at strengthening our offering. This chapter highlights key developments.

Updated approach to defence investments

In October 2025, **Danske Bank Asset Management launched the Danske Invest Defence & Security fund**, providing customers with the opportunity to invest in a diversified portfolio of approximately 60 European and US defence and security companies. Managed by the quant team in Danske Bank Asset Management, this fund stands apart by employing a proprietary, rule-based investment approach. Instead of a traditional market capitalisation exposure, the fund categorises companies into brackets based on their revenue exposure to defence, allocating a larger portion of investments to higher revenue brackets. To further enhance diversification, the fund includes a 15% strategic allocation to cyber security, reflecting the connection between the defence and security sectors.

Response to societal demand

In a time of increasing geopolitical uncertainty, many nations, including the Nordic countries, attach ever greater importance to defence and resilience.

As one of the largest asset managers in the Nordics, Danske Bank Asset Management is well positioned to support the increased societal focus on the defence industry, and on the companies that are active in this field. Our new fund has a focus on NATO countries, allocating investments to Europe and the United States. In comparison with a defence and security market capitalisation index, we have chosen a higher weighting towards European defence companies. This is also to capitalise on the expected growth in the European defence industry over many years to come.

In March 2025, an important step was taken, when we – in

light of the new geopolitical reality and shifting requests and preferences from investors – updated our investment policies and exclusion lists for companies operating in the military and defence industry. As a result of the review, we expanded the investment universe for those categories to include further approximately 30 companies, which were consequently removed from our exclusion list for controversial weapons.

This adjustment followed several other adjustments made in 2024, and across our exclusions for controversial weapons and military equipment, we have expanded our defence-related investment universe by approximately 200 companies within the past two to three years.

Taking a step back, our new defence fund is a clear example of our double materiality approach to responsible investing. It allows us to access tactically and structurally attractive investment opportunities while investing in an area that holds positive societal focus.



The fund follows a structured, rules-based investment approach to US and European defence companies, prioritising exposure to “pure-play” issuers based on the share of revenues derived from defence-and-security-related activities.



Thomas Gade
Head of Quant & Overlay



The launch of the new Danske Invest Defence & Security fund follows extensive customer dialogue, through which we have observed a clear increase in demand for exposure to the defence and security theme over the past three to four years. This development reflects a broader societal focus on security, geopolitical reality, and the role of defence capabilities in supporting resilient societies.



Erik Eliasson
Head of Responsible Investment



+200

The number of companies removed from our defence and military-related exclusion lists in 2024-2025 due to updated exclusion criteria

Taking exclusion transparency and information to the next level

Transparency is critical from a responsible investment perspective, and not least so in an exclusion context, where criteria, definitions and the actual list of excluded companies and issuers can be difficult to identify and interpret. To further promote insights in exclusions applied and exclusion impacts at investment solution level, we have launched **Product Specific Exclusion Reports**, featuring relevant exclusion aspects of individual investment funds from Danske Invest as well as Danske Bank's portfolio management solutions for retail customers.

Investment exclusions are a well-integrated and institutionalised element of investment policies among asset managers and asset owners in the Nordic region, widely adopted and understood, particularly on a conceptual level. However, the matter extends beyond conceptual understanding. As an asset manager, we believe it is our responsibility to provide transparency and offer insight into measurable impact that exclusions have in regard to the reduction of the investable universe. The new Product Specific Exclusion Reports includes the following features:

- Definitions of the different exclusion categories applied
- Number of excluded issuers within each exclusion category
- Total number of excluded issuers per each exclusion category
- Share of applicable benchmark that has been excluded per each exclusion category
- Estimation of the tracking error effect as a result of the exclusion per each category

On www.danskeinvest.com, you can now find links to the Product Specific Exclusion Reports on the pages of the individual Danske Invest funds. You can find the list in two steps:

- Select a fund under 'Our funds' on your local Danske Invest webpage
- Scroll down and click the link under 'Exclusions in the fund'.



Exclusions remove exposure to specified activities or sectors, but exclusions also raise key questions: what do they achieve, and how do definitions and data sources affect the outcome? In what ways are the investment universe and issuer specific characteristics impacted? We are committed to transparency, and our new Product Specific Exclusion Reports on our websites are a significant step forward.



Zoe Carlin
Senior ESG Specialist,
Responsible Investment

New approach for fossil fuel transition investments

In August 2025, we implemented the final phases of our new fossil fuel investment approach based on a developed Net Zero Pathway methodology announced in early 2024. This new approach ensures an enhanced focus on investments in companies that have credible transition plans to support the shift to a more sustainable society and to future-proof their businesses. The design of the methodology is developed to further align with our customers' preferences. Going forward, investment products in scope of the new approach will only invest in fossil fuel companies that are deemed either "Aligned" or "Aligning" to net zero per our internal model, which builds on data from the independent Transition Pathway Initiative (TPI) and on companies' own climate targets.

While the methodology has led to the divestment of a number of fossil fuel companies from portfolios in scope of this new approach, we have increased our investments in other

fossil fuel companies meeting the criteria, leaving our overall exposure to the fossil fuel sector relatively unchanged. Consequently, we now seek to focus primarily on fossil fuel companies that are working to future-proof their business to address the challenges and needs of the future.

A key benefit of our reduced fossil fuel investment universe is the enhanced focus it provides from an engagement perspective. With more capital allocated to the remaining companies, our influence is strengthened, and having fewer companies to concentrate on can lead to increased efficiency of our active ownership efforts.

We will continue to invest in fossil fuel companies to reflect the global economy and global energy supply. However, in alignment with the majority of our customers' preferences, we are becoming even more selective in our fossil fuel investments for most of our investment products.



Our revised approach to fossil fuel investments exemplifies our commitment to double materiality, integrating both financial considerations and impact perspectives. We believe that the energy companies best positioned for success in the future are those with credible and reliable transition plans. At the same time, these transition-focused companies are better positioned to contribute to positive societal outcomes, hence delivering from a double materiality perspective.



Mads Steinmüller
Head of Climate & Nature
Responsible Investment

Product specific sustainability features at your hand

Danske Bank Asset Management launched new **Sustainability Insight Reports** in November 2025. These reports provide a detailed presentation at an individual Danske Invest fund level as well as retail portfolio management solutions and offer a comprehensive overview of the sustainability features and performance of the product, focusing on its alignment with binding sustainability commitments. They provide clear information on key sustainability aspects, including the funds' performance in areas such as inclusion, active ownership and exclusion practices.

- **Exclusion:** You will find an easily accessible overview of precisely which exclusion categories are applied to the individual fund, including the recently introduced categories "Fossil Fuel Transition Laggards" and "Extended Enhanced Sustainability Standards" introduced during 2025.
- **Active Ownership:** The report provides the historical ESG-related engagement and voting activity, going three years back in time.
- **Inclusion:** The inclusion view offers different angles depending on the perspectives applied: sustainability risk inclusion, sustainable investment contribution to the UN Sustainable Development Goals (SDGs), as well as taxonomy alignment.

We have already planned for the inclusion of new aspects and features in the Sustainability Insight Report. Among other things, we are reviewing the possibility of including a more detailed carbon attribution analysis, allowing for the decomposition of the carbon intensity development for a given fund during a given time period.



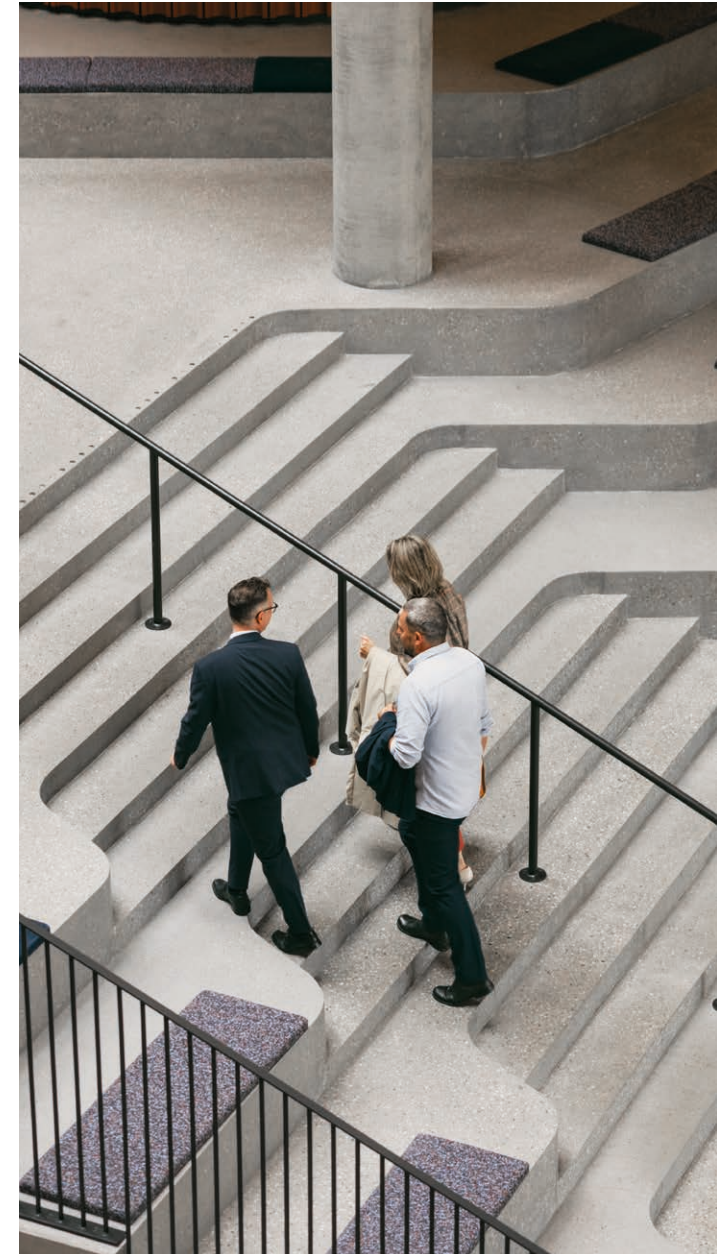
We offer a broad range of mutual funds to our customers. Each fund has its individual value proposition in terms of investment universe, philosophy and process as well as from a responsible investment perspective. We are committed to transparency and comparability across our product range and here, the Sustainability Insight Reports are a step forward. The reports are available in all four Nordic languages and English and aim to provide the overview that will support our customers in taking informed investment decisions.



Alexander Lindwall
Head of Sustainability Concepts & Capabilities, Responsible Investment

On your local Danske Invest webpage, you can now find links to the Sustainability Insights Reports on the pages of the individual Danske Invest funds:

- Select a fund under 'Our funds' on your local Danske Invest webpage
- Scroll down and click the link under 'Sustainability Insights'



Continuous improvement through education

Throughout the year we have arranged numerous events relating to responsible investing, featuring topics and themes such as Green Tech, Defence, Human Rights, Energy Transition and Renewable Energy. These events have featured speakers such as Christian Sandström (Associate Professor and Journalist), Cecilia Tam (Head of Energy Investment Unit at the International Energy Agency) and Peter Viggo Jakobsen (Associate Professor at the Royal Danish Defence College).

We have also continued our CESGA (Certified ESG Analyst) education programme, further strengthening our ESG investment expertise across Danske Bank Asset Management. Over the last five years, more than 100 of our current investment professionals in Danske Bank Asset Management have successfully passed the CESGA exam. The programme is closely aligned with our approach to responsible investment.

Equally important, we have over the past two years expanded the CESGA programme to include our customers. We are grateful for the response and the opportunity to do this together with institutional customers from across the Nordics. Among other things, this gives us common ground and understanding of the responsible investment agenda. Almost 50 persons representing several of our customers have so far taken this certification.

While we will continue to host our CESGA education programme in 2026, our CESGA-certified investment professionals will have the opportunity to pursue the ECRA - the new EFFAS Certified Climate Risk Analyst certification. In an era where climate change is reshaping the global landscape, the ability

to understand and manage climate risks is essential for professionals in the financial and investment sectors. Importantly, ECRA is also open to selected customers, and just as with the CESGA programme, we will host ECRA training sessions as an essential way to prepare for the examination.

Also in 2026, we will in partnership with the Stockholm Resilience Centre facilitate a two-day-course "Integrating Biodiversity into Investment Strategies" for internal investment

professionals and selected customers. This education session will address important questions relating to different ways of thinking about biodiversity, how these differ from climate considerations, the forces driving biodiversity loss, and which metrics and models investors should use to track their progress.

If you as an institutional customer would like to know more and/or wish to reserve a place for future events and education sessions, please contact your Client Manager.

+100
The number of CESGA holders in Danske Bank Asset Management

+40
The number of customer representatives that are Certified ESG Analysts through Danske Bank



Continued learning enables us to adapt to evolving challenges and refine our approach to responsible investment. By expanding educational opportunities, we strengthen expertise and foster informed decision-making, ensuring that both our organisation and our customers are equipped to address critical issues with clarity and precision.



Peter Lindström
Chief ESG Specialist,
Responsible Investment

Active Ownership

Active ownership enables us to monitor and engage with companies and issuers on key matters, including strategy, financial and non-financial performance, risk management, capital structure, corporate governance, and social and environmental impact. Through active ownership we aim to protect the value of our customers' investments, generate attractive returns, and manage the principal adverse impacts of investments.

Our approach to active ownership is guided by the belief that engagement and collaboration often can address complex issues more effectively than exclusions or divestments, which may limit to enter into dialogue with companies and ability to influence change. We conduct active ownership through engagement and voting and prioritise efforts through our Engagement- and Voting Scope.

Our active ownership practices are embedded in Danske Bank's Responsible Investment Policy framework and are governed by the Active Ownership Instruction, supported by Engagement Guidelines and Voting Guidelines. These tools, which are reviewed and updated annually ensure a structured approach to voting and engagement, and enable us to best support companies and issuers in addressing key challenges while meeting the expectations of our customers.

Managing Conflict of Interest in Active Ownership

Our approach prioritises the management of actual and potential conflicts of interest. Key areas where conflicts may arise include: voting at the general meeting of Danske Bank A/S; exercising active ownership with a major shareholder of Danske Bank; voting or engaging with a company that the Danske Bank Group has a business relationship with; and situations where an employee, director, or their personal contacts have a connection to a company held in our portfolios. In each case, conflicts are managed through adherence to our Guidelines on Management of Conflict of Interest in Active Ownership and, where applicable, the Group's Conflicts of Interest policy.

Where a difference of opinion arises on the execution of a vote, the matter is escalated to Danske Bank's Head of Asset Management, Chief Investment Officer and Head of Responsible Investment for review. An appeal of the decision is possible through escalation to the Boards of the fund management companies in the Danske Bank Group.

Engagements

Through engagement, we interact directly with companies and issuers via dialogue and other forms of communication. Guided by our Engagement Guidelines, we conduct engagement activities either individually or in collaboration with other investors and organisations within our Engagement Scope. Our engagements aim to gather insights about investments, inform our voting activities, and, where relevant, support companies in managing short- and long-term financial, governance, or sustainability-related issues.

For the purpose of this report, we have categorised engagement activities into three key themes: governance, social, and environmental.

Find more information on the Active Ownership Instruction and Guidelines on Engagement and Voting, and Management of Conflict of Interest in Active Ownership here:

<https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>



Governance encompasses a wide range of subjects related to the operations and steering of a company, including strategic, financial and non-financial performance, risk management, capital structure, and corporate governance. This explains why the majority of our engagements (and votes) in 2025 were focused on governance-related matters. Topics such as board composition and competence, executive pay, minority shareholder rights, and transparency collectively form the backbone of effective corporate governance. Each issue, while seemingly incremental on its own, contributes to a much larger picture. Together, they shape the framework within which companies operate, make decisions, and ultimately drive competitiveness and long-term value creation.

Individual engagements

Individual engagement activities are conducted by investments teams as supported by the Responsible Investment team and sub-delegated investment managers. We structure our engagements into three categories:

- **Thematic engagements:** These engagements focus on companies selected based on their exposure to key focus areas, which are periodically reviewed and adjusted to align with evolving priorities. For 2025, the thematic engagements were anchored in our overall focus areas of Climate, Biodiversity and Nature, and Human Rights.
- **Event-driven engagements:** These are initiated in response to specific incidents or events that require immediate attention and action.
- **Performance-related engagements:** Conducted on a case-by-case basis, these engagements stem from continuous monitoring of issuers' financial and non-financial performance, strategic direction, industry positioning and sector trends.

Issues which are engaged on are identified and prioritised using multiple data sources, in turn enabling a comprehensive evaluation of both positive and negative impacts on financial outcomes and societal implications.

+1,200

The number of engagements during 2025

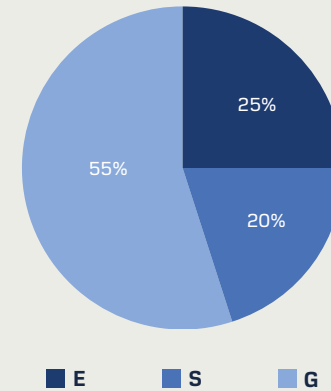
+500

The number of issuers/companies' engaged with during 2025

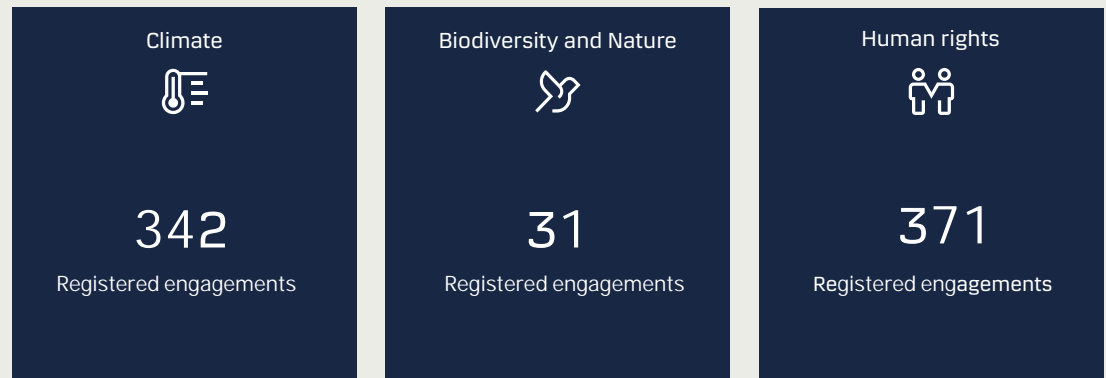
~50

Countries where issuers/companies where domiciled

Engagement activities' breakdown



Engagements by focus area in 2025



Our engagement activities include:

- Written correspondence, such as letters or emails, to raise concerns or request specific information.
- In-depth meetings with key stakeholders, including members of the Board of Directors, Investor Relations teams, or other relevant representatives.
- Participation in events such as conferences and site visits, fostering communication and providing valuable insights.

A structured and effective engagement process is maintained by logging and monitoring all interactions with companies and issuers, ensuring progress and outcomes are tracked over time.

Collaborative engagements

In Danske Bank Asset Management, we collaborate with other investors, stakeholders, and formal networks to address systemic challenges and advance responsible investment practices. By engaging collaboratively, we seek to support companies in addressing critical issues, managing risks, and enhancing their positive impact. Our commitment to active ownership through collective action is an integral part of our broader role as a responsible investor.

Collaborative efforts are an important part of our active ownership approach, enabling us to tackle broader issues that may require collective action. Through partnerships with organisations such as Climate Action 100+ and the Institutional Investors Group on Climate Change (IIGCC), we engage in joint dialogue with companies to address sustainability-related challenges and promote responsible business practices.

Collaborating with peers, like-minded investors, and other stakeholders strengthens our ability to address and educate ourselves on companies' management of governance and sustainability-related issues. By pooling resources and expertise, the investment industry gains a stronger collective voice to encourage companies to address sustainability-related risks and improve their practices.

Our participation in collaborative engagements is anchored with the Responsible Investment Committee, guided by our Active Ownership Instruction and conducted in compliance with applicable competition laws as well as internal policies and guidelines. Cooperation may occur through formal networks, membership forums, or on an ad-hoc basis, depending on the nature of the issue at hand. These efforts focus on developing responsible investment practices, encouraging transparency and raising sustainability standards across companies and financial markets.

Engagement Scope:

Principle no. 1: Materiality assessment

Engage with issuers with negative operational performance and/or when a severe sustainability event has occurred that prompt an engagement.

Principle no. 2: Commitments

Engage with issuers that have been defined as part of target commitments established through Danske Bank's involvement in the Net Zero Asset Owner Alliance, Net Zero Asset Manager Initiative or through individual commitments established, such as with regards to the application of our proprietary Biodiversity Assessment Framework and Net-Zero Pathway Framework.

Principle no. 3: Material exposure

Engagements with issuers are predominantly undertaken with certain investments where we manage a stake exceeding a value of 75 DKK mil or >0.40% of the capital in an issuer. However, on an ad-hoc basis engagement and due to existing processes or commitments, engagements can be carried out with issuers where we hold a more limited stake and/or where none of our managed strategies are currently invested.

As a main rule, engagements are not exercised in the following situations:

- in markets involving excessive formalities or administrative requirements
- under circumstances where it is difficult to justify the financial cost of exercising engagements.



Voting at general meetings

As shareholders of public companies, our customers are entitled to vote on matters proposed by a company’s management or its shareholders. Most of our customers authorize Danske Bank Asset Management to exercise this right on their behalf. For those customers, and in line with our fiduciary duty, Danske Bank Asset Management is required to vote by proxy consistent with the investment strategies and expressed sustainability preferences we manage on their behalf.

We vote on management and/or shareholder resolutions to approve or disapprove of corporate governance practices as well as relevant environmental and social matters. We seek to vote the shares that fall within our Voting Scope where we are mandated to exercise voting rights, while taking into account preconditions, available resources, and the costs of exercising those rights. The Voting Guidelines provide a guide for how we anticipate voting on a given agenda item. As outlined in the Voting Guidelines, through voting, we seek to support a company’s long-term growth potential, mitigate its sustainability risks and minimise its adverse impacts on society. The Voting Guidelines reflect market developments and 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 customers best.

We publicly disclosure our voting records on a Voting Dash Board available on the Danske Bank website.

Proxy voting

We exercise voting by ourselves or by proxy through a third-party adviser. Our approach to using voting rights for the assets we have under management is outlined in our Voting Guidelines, covering a wide array of topics on which basis we can instruct our third-party provider to exercise shareholder rights at general meetings when in-person attendance is not possible. We use Institutional Shareholder Services (ISS) as our proxy voting provider.

Most significant votes and themes

In 2025, a number of proposals attracted heightened stakeholder attention and served as key reference points for our active ownership approach. These votes broadly fell into three areas: (i) assessment of climate transition plans and climate-related

Voting Scope: (as revised in 2026):

Principle no. 1

Majority of Equity Portfolio Value: Vote the largest holdings on an individual portfolio in scope (in terms of market value), meaning the sum of voted holdings should exceed 50% of the individual equity portfolio value.

Principle no. 2

Substantial ownership (>0.40%): Vote all shareholdings that have substantial ownership, meaning exceeding 0.40% of votes or capital in an investee company.


Principle no. 3

Issues of material importance: Vote on issues of material importance, which could be related to, for example, shareholder proposals regarding the environmental, social area, board diversification, political lobbying and/or media attention.

Principle no. 4

Engagement scope: Vote on relevant equity shareholdings identified under the engagement scope.

Thematic working groups we participated in through collaborative initiatives

 **Climate**

- Climate Action 100+ : AP Moller; ArcelorMittal; BHP; National Grid; Pemex; SSAB; and tata Steel
- IIGCC: Neste, Powergrid Corp of India, Shin-Etsu; TSMC and Vattenfall
- ShareAction: Banks

 **Nature**

- Nature Action 100: Novo Nordisk
- FAIRR: Biodiversity Loss from Waste and Aquafeed
- IPDD: Brazil

 **Human Rights**

- Advance: E.on; Lundin; and Orsted;
- FAIRR: Labour risk in supply chains
- UNICEF: Stillfront

disclosures; (ii) governance and board accountability (including voting on directors and pay structures); and (iii) social and human-capital topics, including proposals linked to diversity, equity and inclusion (DEI), human rights due diligence, and labour-related risks.

Our Voting Scope supports the identification of the holdings of significance that we will always seek to vote on. A sample of the application of these principles is demonstrated below.

Apple (US): The agenda included proposals concerning DEI programmes, use of AI, approaches to addressing child exploitation risks, and charitable giving were prominent topics during the season. We supported management proposals and did not support the shareholder proposals, consistent with our assessment of the proposals against our guidelines and their ability to contribute to long-term shareholder value.

Starbucks (US): The agenda included proposals linked to charitable contributions, human rights risks connected to labour relations/unionisation, animal welfare and certain environmental management topics. We supported most management items and did not support the shareholder proposals, applying our guidelines and a materiality-focused assessment.

Nordea (Nordics): The agenda included a shareholder proposal requesting business activities to be aligned with the Paris Agreement attracted attention. We did not support the proposal following our assessment of the request and its effectiveness as a voting mechanism. The proposal was rejected by the general meeting (95.35% votes against).

Shell (UK): The agenda included climate-related proposals. Our voting highlighted the role of board accountability in relation to climate-related operational risk preparedness. We also assessed a climate disclosure proposal and did not support it where we considered the request to be redundant given existing commitments. The proposal was rejected by the general meeting (79.44% votes against).

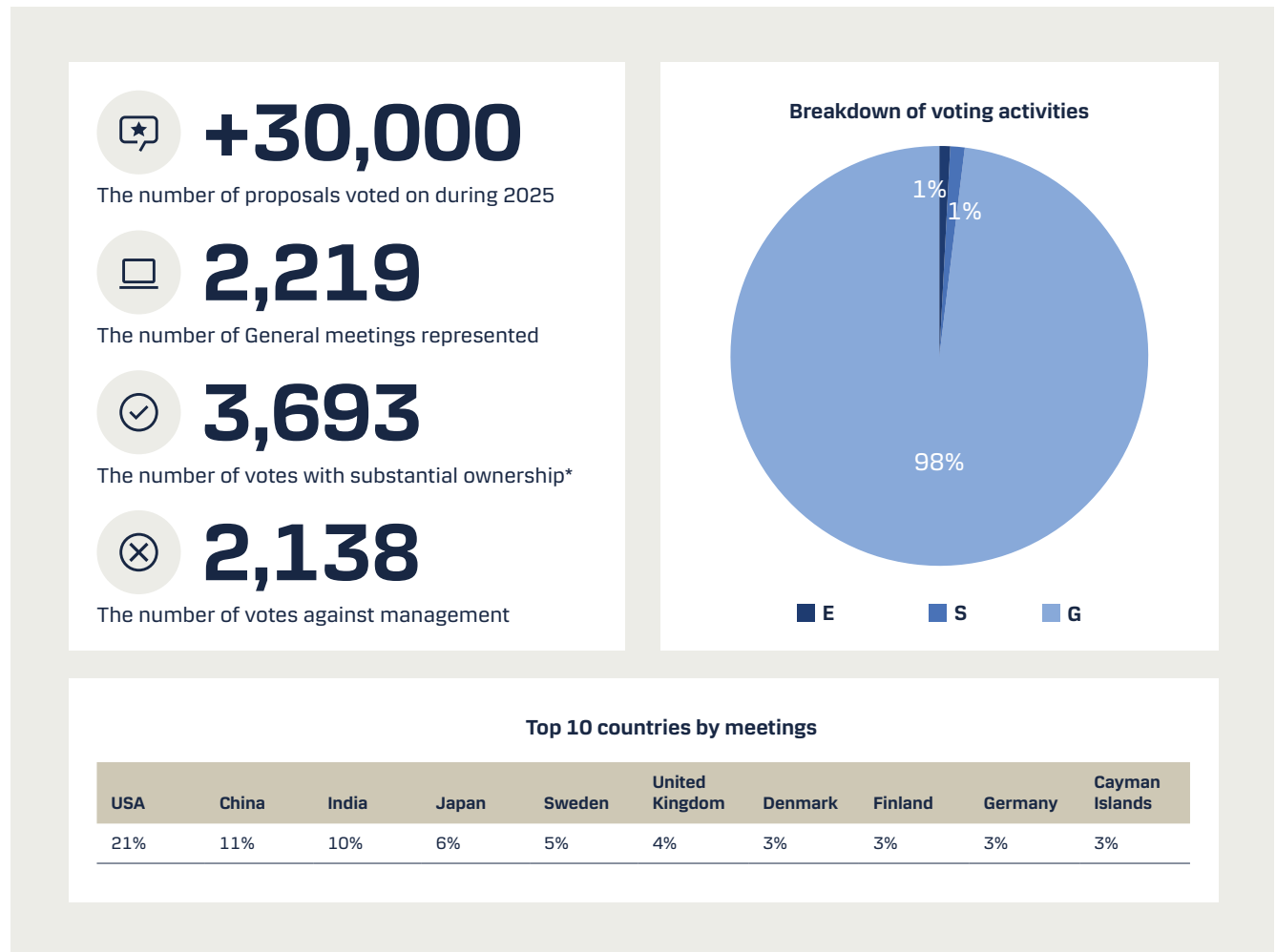
Amazon (US): The agenda included a climate disclosure proposal. We did not support it where the scope of the request was considered too broad and challenging to implement at the company's

scale. The proposal was rejected by general meeting (85.49% votes against).

Rio Tinto (UK/Australia dual-listed structure): The agenda included a shareholder requisitioned proposal calling for an independent review of the company's dual-listed structure. We supported the proposal reflecting our assessment of potential

governance and financial implications. The proposal was rejected by the general meeting (80.64% votes against)

BP (UK): We used votes on director elections to signal expectations on board oversight and accountability in relation to sustainability-related targets and disclosures. The election of the respective board members was approval by the general meeting.



* Measured through shares held Q1 2026

Active ownership in private equity and private credit

Investments in private assets often give investors greater ability to engage with companies and influence how assets are managed. At Danske Bank Asset Management, we apply a range of active ownership practices across the investment lifecycle of our private equity and private credit investments.

Engagement is among others directed at external private equity and private credit fund managers that we are invested with. Active ownership is exercised throughout the investment lifecycle, from initial onboarding of new fund investments to ongoing monitoring and follow-up. This includes ESG manager assessments and reviews, as set out in the Engagement Guidelines.

For most external managers of our private equity and private credit fund investments, an initial ESG due diligence is conducted as part of onboarding. The assessment evaluates how the manager meets Danske Bank Asset Management's standards and expectations for sustainability-related processes and responsible investment practices. The conclusions are included in the investment proposal and establish a baseline for monitoring future developments in the manager's sustainability practices.

Following onboarding, active ownership is exercised through ongoing engagement, including an annual external manager ESG review. The annual review is a structured post-investment engagement activity and is applied consistently year on year to support comparability across managers and to track progress over time.

The latest review covered more than 20 eligible managers, with close to half of the external managers assessed as advanced in

their sustainability practices. The review also served as a basis for targeted engagement where certain indicators suggested potential concerns. Managers received tailored written feedback highlighting strengths and priority areas for improvement in form of written dialogue and meetings.

The ESG review process for onboarding and annual follow-up is subject to independent assurance and has received an ISAE 3402 Type II declaration.



In private markets, transparency is not a given—so we rely on a disciplined, consistent process. Our ESG due diligence at onboarding and annual manager reviews enable us to identify ESG risks early, and capture investment opportunities linked to stronger governance and sustainability practices. Independent assurance strengthens confidence in the robustness and consistency of the process.



Casper Bonde
Head of Illiquid Alternatives



Reflections on 2025

Throughout the year, we encountered various challenges which tested our approach and commitment to exercising active ownership. Our work during 2025 focused on navigating the increased complexity that characterized global markets and the risks facing our investments. Despite political headwinds in certain markets, especially related to anti-ESG sentiments in the United States, which created uncertainty around the sustainability commitments of some portfolio companies and investors, we continued to raise these issues. During the year, we demonstrated our ongoing commitment as responsible investors by emphasizing the long-term financial significance of sustainability-related risks and opportunities in engagements and our voting practices, regardless of the prevailing political climate.

We found increased value in remaining in collaborative engagements with like-minded peers and through established networks such as Climate Action 100+ and PRI's Advance initiative to support engagements with companies where regulatory frameworks for sustainability disclosure remain nascent or where corporate receptiveness to ESG dialogue is limited. Drawing on the strength of these initiatives, allowed us

to address language barriers, limited resources and ownership structures, which have, at times, constrained the depth of possible engagement possible.

As further indication for our commitment, in collaboration with others, and the support of UNICEF Sweden, we launched a dedicated engagement initiative addressing the identified risks in the digital environment to children's rights.

We have also focused on refining our governance framework and underlying data infrastructure to ensure our engagement strategies remain impactful. With the implementation of our new engagement platform, ESGAIA (Glass Lewis), in 2025 significantly enhancing our ability to monitor and track active ownership efforts.

Active ownership has a significant impact on our investments and the returns we deliver to our clients. By engaging with our investments, we strive to integrate sustainability into their respective strategies, which can contribute to more responsible practices, robust risk management processes, and stronger performance development.



Oshni Arachchi
Head of Active Ownership
Responsible Investment



Focus Areas

Climate

A key part of our responsibility to offer investment solutions that deliver competitive, long-term performance while accommodating our customers' sustainability preferences is integrating climate-related considerations into our investment solutions. Through the double materiality approach, we assess both how climate-related factors affect our investments and how our investments impact society. This enables us to identify physical and transition risks, as well as opportunities, and to offer responsible investment products that aim at aligning with our customers' values and preferences.

While our home markets are primarily Nordic, our investment universe is global, meaning our approach is tied to international efforts and challenges in reducing emissions. By prioritising real-world emissions reductions, applying exclusions, and investing in companies with credible climate transition strategies, we remain committed to advancing the transition to a low-carbon economy and delivering long-term value for our customers.

Our evaluation of companies focuses on how they manage climate-related risks and opportunities associated with the transition to a low-carbon economy. Where significant adverse climate risks and impacts are identified, we may address them for instance through event-driven exclusions under our Enhanced Sustainability Standards Exclusion screening process. For specific sectors, such as thermal coal and tar sands, revenue-based exclusions are applied across most of our managed investment products.

As a significant climate step during 2025, Danske Bank Asset Management implemented a new investment approach to fossil fuel companies, assessing such companies through the lens of our Net Zero Pathway framework. For the investment solutions and asset classes covered by this approach, the implementation means that we now only invest in companies with a clear and credible transition focus. You can read more about the new approach at page 6.

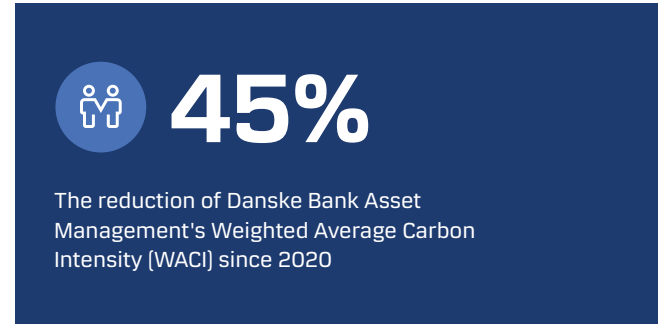
To support the goals of achieving net zero by 2050 in line with ambitions of the Paris Agreement within our assets under management, we have established specific carbon emission reduction targets for asset management portfolios. The targets guide our investment decisions and support efforts to safeguard investments while ensuring long-term value for our customers.

In 2021, we introduced a Weighted Average Carbon Intensity (WACI) target, aiming at a 50% emission reduction in Scope 1 and Scope 2 emissions by 2030 against the 2020 baseline year. The WACI target is based on a defined scope of our assets under management, and does not cover all assets. This target was supplemented by a target to engage with the 100 largest emitters (Scope 1, 2, and 3) in our portfolios by 2025. To provide a forward-looking perspective on our climate ambitions, we have also adopted temperature rating targets for our assets under management. The temperature rating targets consider the future transition plans and climate targets of investee companies.



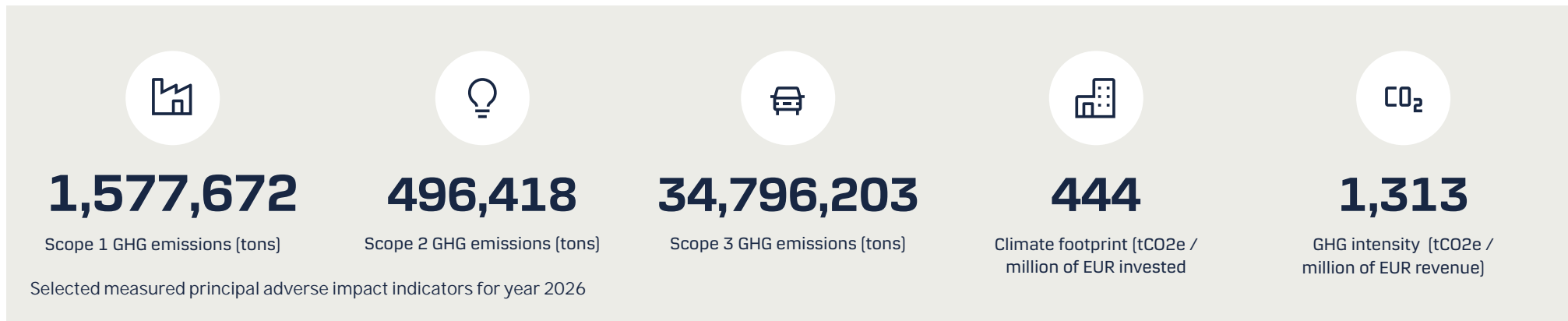
In the Climate Progress Report and Sustainability Statement for Danske Bank, we outline the methodology and scope of the individual targets and report our progress. As stated in the report, by 2025 the WACI for our asset management portfolio had decreased by 45% compared to the 2020 baseline, exceeding the linear trajectory towards our 2030 targets. This reduction was driven equally by portfolio adjustments and investee company improvements, reflecting our strategy to prioritise real-world emissions cuts through investments in companies with credible transition plans, leveraging active ownership, and applying exclusions where necessary. Equally in respect of the temperature rating targets, the trajectory is progressing well against the targets, however, slower progress has been observed in areas where fewer companies publish climate targets covering Scope 3 emissions.

Looking ahead, Danske Bank Asset Management remains committed to its 2030 WACI reduction target and its temperature rating targets. We acknowledge that political headwinds and macro-economic uncertainties in certain regions may impede companies from committing to, investing in, adopting or disclosing credible climate targets. We will continue to monitor these developments closely, maintain our engagement activities with high-emitting companies and refine our investment approach as the energy transition evolves. Our commitment to the goals of the Paris Agreement and to supporting the transition to a low-carbon economy remains unchanged.



Find links to the Climate Progress Report and Sustainability Statement for 2025 on the Danske Bank website, here:

<https://danskebank.com/sustainability>



Engagements

Engaging with companies is increasingly becoming a vital component in helping us deliver on Danske Bank Asset Management’s overall climate targets.

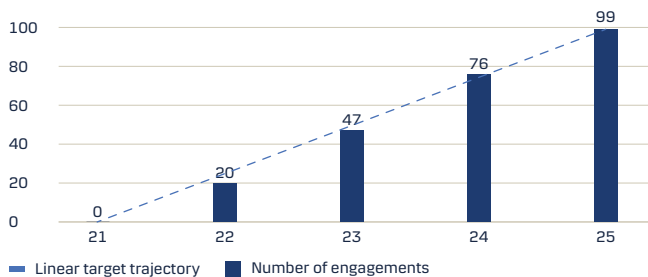
As a selected focus area for our thematic engagements our efforts on climate aim to communicate and discuss climate transitioning with companies operating in high emitting sectors, including the fossil fuel sector. This enables us to identify company-specific gaps in climate strategies, providing a foundation for effective net-zero engagement and encouraging companies to progress along the alignment maturity scale.

Our target to engage with the 100 largest emitters is an important lever in that respect. To evaluate progress towards that target, we have leveraged widely recognised indicators for assessing companies’ approaches to the energy transition. These include net-zero ambitions and targets, governance, strategy, capital asset alignment, commitment to a just transition, emissions performance, climate policy engagement, climate risk accounting, and disclosures. These criteria align closely with those established by Climate Action 100+, widely regarded as the benchmark for climate-focused company evaluation and engagement.

As reported in the Climate Progress Report in 2025, we came very close to meeting our engagement target, initiating dialogues with 99 of the 100 largest emitters within our portfolio. Despite not fully reaching the target, the breadth of these efforts reflects our commitment to driving climate action.

Engagement with the largest emitters - asset management

number of engagements



Initiatives and collaborations

We participate in leading climate initiatives, such as Climate Action 100+ and the Net Zero Asset Managers Initiative (NZAM), and we adhere to the recommendations and guidance set by international standard-setting bodies such as the Partnership for Carbon Accounting Financials (PCAF).

Danske Bank Asset Management joined NZAM in November 2021 and is proud to reaffirm our continued commitment to the initiative. NZAM paused its activities in early 2025 but is preparing to relaunch shortly, embarking on an important new chapter. We look forward to supporting the enhanced efforts of NZAM and continuing our work towards achieving net-zero greenhouse gas emissions across our portfolios by 2050 or sooner.

Read more here: [NZAM: Ready for its next chapter](#)

As a signatory to the UN-supported Principles for Responsible Investment (PRI), we integrate environmental, social, and governance (ESG) factors into our investment processes, ensuring climate considerations are central to our investment decision-making. Additionally, we actively engage with portfolio companies as part of Climate Action 100+, encouraging them to strengthen their climate transition plans and make actionable progress towards net zero.

By supporting the Paris Agreement goals and aligning our investments accordingly, we aim to contribute to limiting global warming to well below 2°C, while striving for 1.5°C. Transparency is central to our approach, and we adhere to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) to provide clear insights into climate-related risks and opportunities.

We believe that collaboration is key to driving meaningful change. By working alongside other investors, stakeholders, and organisations, we seek to strengthen our collective voice in encouraging companies to address sustainability-related risks and advance responsible investment practices across

companies and financial markets. At Danske Bank Asset Management, our approach to sustainability is rooted in our fiduciary duty to deliver long-term value for our customers while accommodating their sustainability preferences. We regard sustainability as both a responsibility and an integral part of our efforts to support sound investment outcomes and broader societal progress.



New York Climate Week

In September 2025, Danske Bank participated in New York Climate Week, engaging with leaders from governments, companies, and civil society. The event underscored the strong global consensus among investors regarding the importance of sustainability, despite prevailing political challenges. During a week marked by discussions on topics such as the increasing energy demand driven by artificial intelligence, solar energy production, and the growing impacts of extreme weather, Danske Bank hosted a well-attended networking breakfast. The event provided an excellent platform for reconnecting and establishing new connections.

Biodiversity

Biodiversity is one of three strategic focus areas prioritised by Danske Bank Group and Danske Bank Asset Management, alongside climate and human rights. The health of global biodiversity is vital to the long-term performance and resilience of companies, with half of the world’s GDP dependent on ecosystems. Addressing biodiversity risks and impacts is therefore not only crucial for meeting the sustainability preferences of our customers but also forms an integral part of our fiduciary duty to grow and preserve the value of their investments.

Our approach to managing biodiversity risks and impacts focuses on identifying and mitigating dependencies and adverse effects across our assets under management. A robust data foundation is essential to this effort, and we are continuously enhancing our ESG data platform with relevant biodiversity-related data. This integration enables a sophisticated understanding of how companies interact with nature. As part of the next development phase, we are onboarding geolocation data to better analyse site-specific impacts and localised risks.

For the majority of investment products under management, we apply targeted exclusions of selected companies to minimise the adverse impacts and risk exposures that such companies may have on the investment portfolio. In total, for the year 2025, Danske Bank Asset Management excluded more than 50 companies due to their negative biodiversity impacts. These exclusions were implemented through our Enhanced Sustainability Standards screening, which serves as a critical baseline to safeguard investments.

Engagements

As part of our commitment to biodiversity, we aim to deepen our understanding of biodiversity impacts and ecosystem dependencies. We focus on raising awareness among investee companies about their biodiversity impacts and associated risks, helping to mitigate those risks while protecting the value of our customers investments.

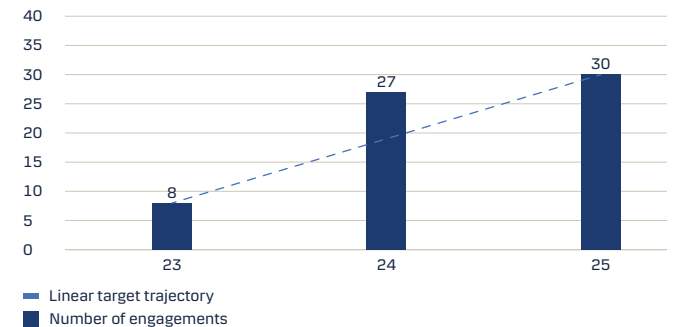
In 2023, we established engagement targets for engaging with 30 investee companies globally by the end of 2025. This effort was guided by our Biodiversity Management Quality Framework, which aligns with the Taskforce on Nature-related Financial Disclosures (TNFD) and Business for Nature.

By the end of 2025, we had initiated all 30 engagements and established dialogue with 27 companies. Notably, 90% of these companies had reached maturity level 3 (second highest) based on our proprietary biodiversity assessment

methodology, the Biodiversity Management Quality Framework. This reflects positive progress made since the baseline engagements initiated in 2023, further demonstrating our commitment to advancing biodiversity management practices across our investments.

Engagement with global biodiversity high-impact companies

number of engagements



<1%

of investments with negative impact on biodiversity sensitive areas

<1

tonnes of emissions to water per million EUR invested

<1

tonnes of hazardous waste and radioactive waste generated per million EUR invested

Important recognition from CERES

In September 2025, the nonprofit advocacy organization CERES issued the report “Nature’s Price Tag - The economic cost of nature loss” where they among other things quantify the cost of nature loss by driver and ecosystem service type as well as identifying engagement priorities. In the report, CERES presents a case study featuring Danske Bank’s thematic engagement with the 30 global biodiversity high-impact companies. The report can be downloaded [here](#).

Initiatives and collaborations

Danske Bank Asset Management demonstrates its commitment to nature through active participation in initiatives such as the Finance for Biodiversity Pledge, the Partnership for Biodiversity Accounting Financials (PBAF) and Nature Action 100, and our approach is reported in the Sustainability Statement embedded in Danske Bank's 2025 Annual Report.

To promote best practices and share expertise, we actively participate in international dialogues, including high-level discussions and panels at COP15 in Montreal and COP16 in Cali. Building on these initiatives, we have launched biodiversity-focused investment analysis and made firm commitments to integrate biodiversity considerations into our active ownership activities.

Research

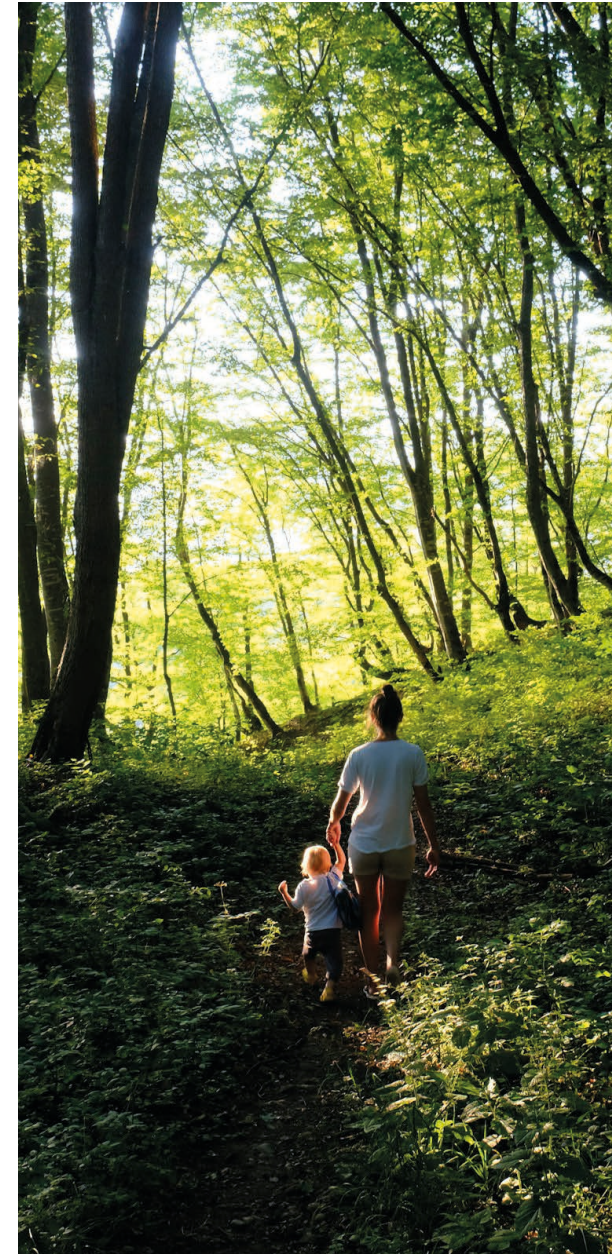
Ongoing research is a vital component of our approach, aimed at addressing the "blind spot" in current corporate reporting and target-setting. Our analysis from 2024, *Navigating Biodiversity - A Review of 100 Nordic Companies*, has revealed that while 71% of the 100 Nordic companies investigated are exposed to material biodiversity risks, fewer than 15% have established clear targets in relation to reducing their impact and/or restoring nature. To help bridge this gap and inform customers, we regularly publish thought leadership and white papers. Recent publications include *Water the Investment Risk?*, *Climate and Nature Talk in Nordic Earnings Calls*, and *Welcome to the Jungle*. These efforts contribute to a shared understanding of biodiversity as a systemic risk and support the transition towards a nature-positive future.

Presentation of white paper focusing on carbon performance

In January, we participated in the Sustainable and Impact Investments International Conference (SIIC) held in Dublin, Ireland.

The conference, organised by (among others) the Quinn School of Business in Dublin, the EU Joint Research Centre and Sapienza University of Rome, is an annual meeting for international scholars, practitioners and policy makers involved in the social impact finance field. Among other things, the SIIC offers publication opportunities and best paper awards, and engages leading scholars and professionals.

At the conference the Danske Bank white paper: "Navigating sustainability: The role of management quality in enhancing companies' carbon performance from a Nordic perspective" was presented. You can read the full white paper here: <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>



Human rights

Management of societal impact is one of the focus areas within the strategic priorities of Danske Bank and Danske Bank Asset Management. We prioritise human rights considerations and are continuously working to enhance our human rights due diligence and screening processes.

As investors we can be directly linked to human rights risks through the business activities of companies or activities of other issuers with a responsibility to respect human rights throughout our investment value chains. In this regard we are guided by authoritative global standards such as the UN Guiding Principles on Business and Human Rights and the recently updated OECD Guidelines for Multinational Enterprises. Aligned with the sustainability preferences of our customers, we are committed to respecting fundamental human rights and labour rights, including decent working conditions, within investment decision-making processes.

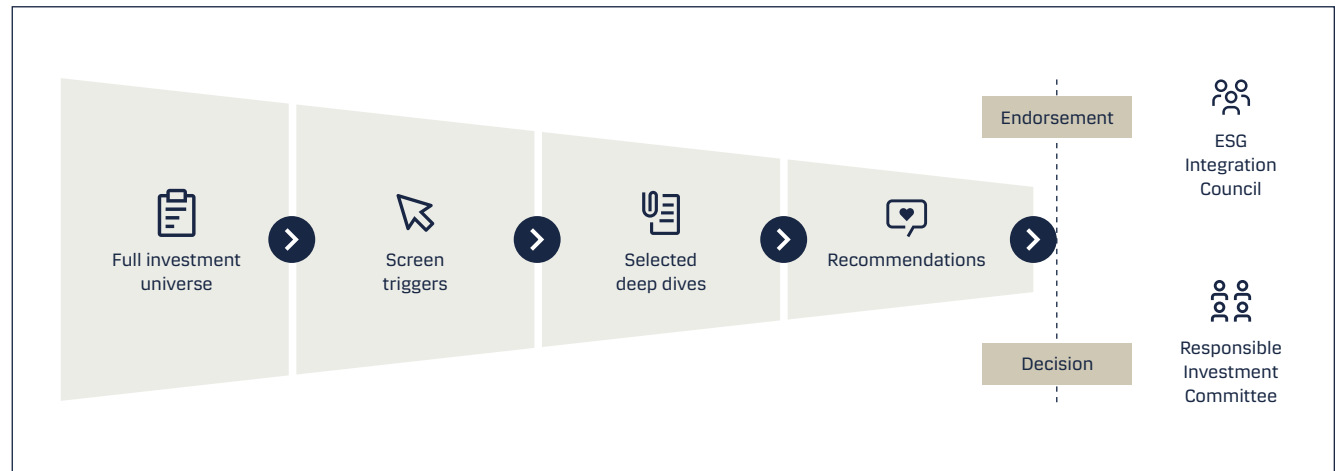
We consider human rights-related impacts of investments from a double materiality perspective and assess how human rights considerations may affect the value of our investments as a sustainability risk factor, taking into consideration risk factors for specific sectors, regions, and other factors relevant to the investments. From an impact materiality perspective, we consider the principal adverse impacts associated with human rights and report annually in our Principal Adverse Impact Statement on these impacts through the share of investments in companies involved in violations of the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the share of companies without a human rights policy.

As part of Danske Bank, human rights-related activities within Danske Bank Asset Management are also annually disclosed and reported in the Human Rights Report of Danske Bank and the Modern Slavery Act Statement.

Our proprietary Enhanced Sustainability Standards screening plays a key role in our investment analysis, as it identifies potential adverse human rights impacts. Conducted twice a year, the screening reviews incidents

where companies or issuers are alleged to have engaged in severe controversies that violate international norms such as the UN Global Compact principles, the ILO conventions on labour rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The screening covers an investment universe of more than 80,000 companies and issuers.

When a potential violation is identified, a thorough assessment of the indicators pointing to the breach is conducted, including its severity, impact, scale, and, where applicable, the issuer's receptiveness to addressing the issue. Based on this analysis, we present a recommendation to the Responsible Investment Committee (RIC), which decides whether to close the case, place the investment on our watchlist, or flag it for potential exclusion. For more information about RIC, please see page 26.



<1%

of investments companies that have been involved in violations of the UN Global Compact principles or OECD Guidelines for Multinational Enterprises

7%

of investments in companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises

0%

of investments in companies involved in the manufacture or selling of controversial weapons

Companies and issuers may be added to the watchlist for various reasons. These include situations where an alleged breach has been identified but there is insufficient evidence to justify exclusion, or where the severity of the issue does not warrant exclusion but merits engagement or ongoing monitoring to ensure the company is taking appropriate steps to address the concern.

The watchlist is reviewed continuously, allowing us to take relevant actions as new information becomes available. Updates may arise through direct engagement, data vendors, or other sources, ensuring a dynamic and informed approach to responsible investment practices.

The methodology supporting our Enhanced Sustainability Standards screening process is available here:

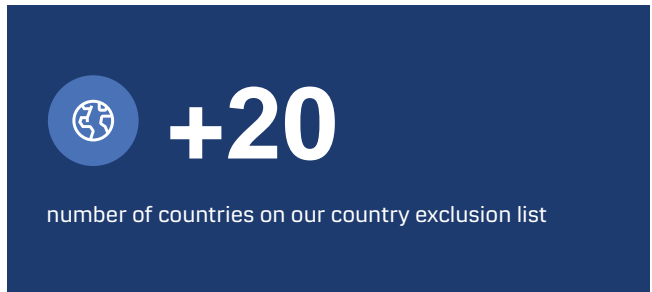
<https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

Sovereign screening

As a sub-process within the Enhanced Sustainability Standards process, we have developed a sovereign screening framework which aims to ensure that our sovereign investments align with our environmental, social, and governance (ESG) standards.

Our approach involves a comprehensive framework that integrates both quantitative and qualitative assessment methods:

- **Quantitative Assessment:** We utilise a quantitative framework that evaluates countries based on a range of ESG factors. Each sovereign state is scored on a scale of 0 to 10, with lower scores indicating weaker sustainability practices. Countries with a social score below 2.5 and an aggregate ESG score below 3.5 are automatically included on our country exclusion list and subjected to mandatory qualitative review.
- **Qualitative Review:** In addition to the quantitative assessment, we conduct a qualitative review to ensure that our



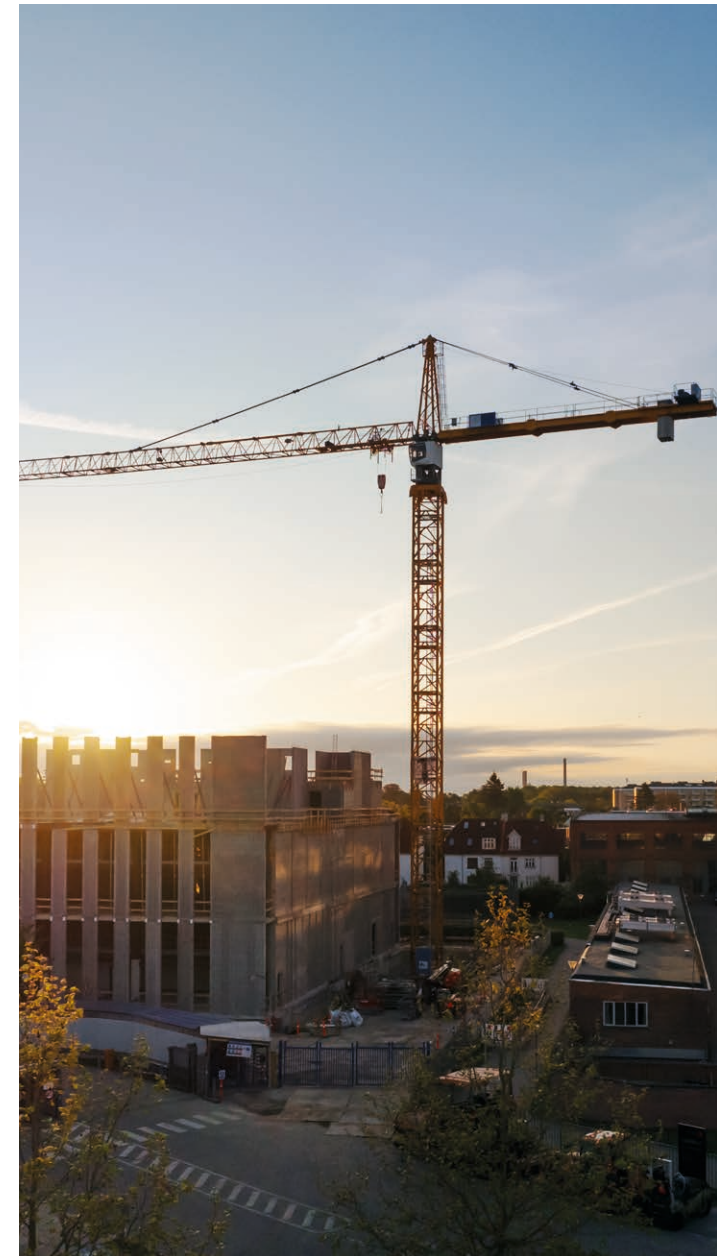
decisions are informed by current and relevant information. This review considers recent developments and future trajectories, providing a more nuanced understanding of each country's sustainability landscape. It allows us to account for changes that may not yet be reflected in the quantitative data.

Engagements

As an asset manager, we believe that active ownership is a more effective approach to addressing complex human rights challenges compared to implementing exclusions. Through engagement with investee companies, we can gain valuable insights into how businesses manage and integrate human rights considerations into their operations. This enables us to promote positive change while deepening our understanding of their practices.

In 2025, engagements were conducted by Danske Bank Asset Management or our delegates with close to 400 companies on critical human rights related issues such as labour standards, human rights and supply chain management, and other social challenges. These dialogues aimed to encourage companies to strengthen their practices and align with international standards.

Through our membership of the UN PRI's Advance stewardship initiative, we actively participated in working groups engaging with companies such as EoN, Lundin Mining, and Ørsted. The discussions focused on aligning corporate practices with the UN Guiding Principles on Business and Human Rights, strengthening stakeholder engagement, implementing living wages, and establishing effective grievance mechanisms.



Integrating sustainability criteria and -risks in products

Danske Bank Asset Management offers a comprehensive range of investment products across asset classes, tailored to meet the diverse sustainability preferences and risk profiles of our customers. Our offerings include flagship products, solutions, illiquid alternatives, and bespoke mandates for institutional customers, all reflecting varying degrees of focus on sustainability. To ensure that investments align with our overarching commitment to responsible investment, we apply the principles outlined in our Responsible Investment Policy. This includes instructions on sustainability risk integration and depending on the ESG strategies employed within each product, instructions on exclusions, inclusions, and active ownership.

Sustainability considerations are integrated into the investment process for our managed investment products through structured risk oversight and portfolio-level sustainability assessment. Danske Bank Asset Management employs proprietary tools—the Sustainability Risk Alert Framework and the Sustainability Portfolio Construction Standards—to ensure that sustainability risks and impacts are systematically identified, monitored, and reflected in portfolio construction.

Sustainability Risk Alert Framework

Sustainability risks can impact investment value differently depending on geography, sector, and asset class. Our Sustainability Risk Alert Framework helps identify portfolios with elevated sustainability risks that may require closer attention.

The framework uses recognised sustainability risk indicators and proprietary metrics to assess risks across corporate and sovereign exposures. Portfolio-level sustainability risk is calculated using weighted averages, ensuring assessments reflect actual exposure rather than individual holdings in isolation.

Risks are evaluated both on an absolute basis and relative to the portfolio's benchmark, providing transparency on elevated risk profiles.

For private or unlisted assets, where data is more limited, risk is assessed based on sector exposures and underlying characteristics. The framework acts as an internal monitoring tool to support risk dialogue and structured responses to identified sustainability risks.

Sustainability Portfolio Construction Standards

While the Sustainability Risk Alert Framework addresses risk monitoring, the Sustainability Portfolio Construction Standards focus on broader sustainability considerations in portfolio construction. Guided by the principle of double materiality, the standards capture both how sustainability factors may influence financial performance and how investments contribute to environmental and social outcomes.

Core indicators—including sustainability risk, principal adverse impacts, sustainable investments, and EU Taxonomy alignment—are assessed against predefined performance ranges and aggregated into an overall portfolio signal. This approach integrates multiple sustainability dimensions, balancing absolute measures, benchmark comparisons, and forward-looking trajectory assessments.

The standards serve as a decision-support tool, providing transparency and structure without prescribing specific portfolio outcomes.

Together, the Sustainability Risk Alert Framework and Sustainability Portfolio Construction Standards offer a

cohesive view of sustainability within the investment process. The risk alert framework identifies elevated risks affecting portfolio resilience, while the construction standards provide a holistic assessment of sustainability performance across dimensions. This combined approach ensures consistent oversight, informed dialogue, and greater transparency on how sustainability considerations are embedded in portfolio construction.

You are able to find information on the exact exclusions applied by the individual funds and exclusion impacts on the fund pages at your local Danske Invest site.

Exclusions for environmental and social safeguards

Most of our broadly distributed investment products incorporate exclusions addressing minimum environmental and social safeguards, targeting areas such as norms violations, controversial weapons, fossil fuel transition laggards, tobacco, and thermal coal. For customers with heightened preferences to avoid certain sectors—such as alcohol, fossil fuels, and gambling—we offer an extensive range of supplementary investment opportunities.

Sustainable offering

Our sustainable investment products range includes products with a sustainable investment objective and/or those where the majority of assets are allocated to sustainable investments. These funds are subject to stringent exclusions, such as Paris Aligned Benchmark (PAB) exclusions, and are guided by methodologies defined by Danske Bank, including our proprietary SDG Model. This model assesses contributions to sustainable development goals and attributes those contributions at the portfolio level.

Read more about our Sustainable Investment Methodologies and Models here: <https://danske-bank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

Offering with a transition focus

Danske Bank Asset Management is committed to enable our customers to support the transition to a low-carbon economy through our investment offerings, which include Climate Transition Benchmarks (CTBs) and Paris Aligned Benchmarks (PABs) funds. These funds are designed to align with the goals of the Paris Agreement, aiming to limit global warming to well below 2°C, and ideally to 1.5°C.

Funds that follow the CTB benchmark, supporting a gradual transition towards a lower-carbon economy. It requires a minimum decarbonisation trajectory of at least 7% annually, with

a baseline reduction of greenhouse gas emissions of at least 30% compared to the investable universe.

Funds that follow the PAB benchmark, are subject to more ambitious climate constraints, with required reduction of at least 50% compared to the investable universe, and a decarbonisation trajectory of 7%.

Both CTBs and PABs adhere to a set of minimum exclusion criteria within the benchmarks and are supplemented by an extensive set of exclusions that we apply to best address the adverse impacts of the funds.

Our full fund range, including detailed product-level sustainability disclosures, can be accessed at the local country sites of Danske Invest and Danske Private Equity. Through our responsible investment approach, we strive to be a catalyst for sustainable development while delivering value to our customers.



When customers entrust us with their assets and savings for investments, it's our duty to serve our customers best interest by providing investment solutions that aim to deliver competitive and long-term investment performance. An integral part of this duty is investing responsibly and to manufacture investment products that align with our customers preferences. We conduct regular reviews on our criteria in consultation with clients to ensure our practices remain aligned with their evolving preferences. This collaborative approach not only refines our criteria, but also strengthens our long-term client relationships.



Thomas Otbo
Chief Investment Officer

Product perspective: Global Future

For investments in private equity and infrastructure, we manage our Global Future Strategy that seeks transition related investment opportunities—where we assess whether companies and assets have credible plans, products or services that may support the decarbonisation of the economy, while still targeting attractive long term risk adjusted returns. Applying this lens requires additional consideration in portfolio construction and oversight, including clear inclusion criteria, robust due diligence on transition pathways through the Net Zero pathway framework, technology readiness etc., and ongoing monitoring over multi year holding periods where data availability and comparability can be limited. It also calls for alignment on incentives, disclosures and reporting with external managers and co investment partners, alongside disciplined underwriting of liquidity, pacing and vintage diversification to reflect the long dated nature of the asset class.



Substantial investment will be required in the green transition in the coming years if we are to reach the global climate targets. Therefore, we see a large volume of attractive investment opportunities within this theme and expect that trend to continue in years to come.



Frederik Hoffmann von Holten
Head of Green Transition and Infrastructure

Product perspective: Nordic Responsible Focus

The Nordic Responsible Focus strategy applies a long term, disciplined approach to responsible equity investing, combining fundamental stock selection with clearly defined sustainability criteria and a commitment of investing minimum 50% of

assets in sustainable investments. Managed by Danske Bank’s dedicated Nordic equity team, the strategy benefits from close proximity to companies and markets across the region, supporting informed assessment of both financial fundamentals and sustainability considerations.

Sustainable investments are identified using the SDG lens of Danske Bank’s proprietary model and assessed at company level. Using the SDG model as a portfolio construction tool ensures tangible consequences for the composition of the strategy. This approach is complemented by extensive exclusions, systematic sustainability risk integration and active ownership.

The Nordic equity universe provides a strong foundation for this approach, characterised by transparent markets, high disclosure standards and a diversified opportunity set across areas such as healthcare, industrial innovation and parts of the energy transition, where sustainability considerations are often reflected in established business models rather than short term positioning.



The Nordic Responsible Focus strategy naturally reflects areas of Nordic strength, such as healthcare, industrial innovation and parts of the energy transition, driven by company fundamentals rather than thematic targets. It combines a clearly defined SDG framework with fundamental analysis, sustainability risk integration and active ownership, all implemented by a team embedded in the region they invest in.



Olga Karakozova
Chief Portfolio Manager

Examples of products and services, as well as use of proceeds from bonds, that we have classified as having a positive contribution to one or more of the SDGs.

Air filtration equipment	Electronic waste services
Allergies management	Garbage collection services
Asthma therapeutics	Job websites
Building insulation	Metal recycling
Bus transportation services	Photovoltaic and solar cells
Carbon capture services	Security and safety equipment
Class I railroads	Surgical robotic systems
Depression therapeutics	Veterinary services
Diabetes drugs	Waste management services
Disability insurance	Water filtration equipment
Educational services	Water utilities
Electric vehicles	Wind energy products
Electrical infrastructure	

* include footnote: will come with text

Embedding Responsible Investment across the organisation

Across the Nordic region, our customers expect us to invest and manage their assets responsibly. For some years now, our focus has been to build a strong infrastructure and robust processes to integrate sustainability considerations into our investment processes and products. Everything we do is anchored in our fiduciary duty to protect and grow our customers' investments in line with their sustainability preferences to support the transition to a more sustainable society.

Responsible Investment Policy

At Danske Bank, we have established a comprehensive framework to integrate, oversee and execute responsible investment practices. This framework ensures that our commitment to responsible investing is embedded across all levels of the organisation. Designed to be dynamic, the framework enables us to adapt to evolving regulatory requirements, customer preferences and stakeholder expectations.

The foundation of our approach is built on the Responsible Investment Policy, adopted by the Board of Directors in Danske Bank. This Policy outlines Danske Bank's commitment to responsible investment and incorporates sustainability considerations through the principle of double materiality. This means that sustainability factors are assessed both for their potential impact on the financial performance of our investments (financial materiality) and for the impacts our investments may have on the environment and society (environmental and social materiality).

Danske Bank Asset Management provides a wide range of investment products with varying levels of sustainability

commitments, tailored to meet the diverse preferences and needs of our customers. Investments are governed by the Responsible Investment Policy as supported by instructions on Sustainability Risk Integration, Active Ownership, and Inclusions and Exclusions, as well as a robust monitoring and oversight framework. Our approach aligns with international standards, including the UN-supported Principles for Responsible Investment (PRI), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights.

Responsible Investment Committee

The Responsible Investment Committee plays a crucial role in executing and overseeing the Responsible Investment Policy. It operates under the Business Integrity Committee, which comprises all members of the Executive Leadership Team in Danske Bank and is chaired by Danske Bank's Chief Executive Officer.

While the Business Integrity Committee endorses the Group's strategic direction, ambition level, and sustainability policies, the Responsible Investment Committee is responsible for establishing the ambition level and overseeing the implementation of the Responsible Investment strategy.

As a permanent committee, the Responsible Investment Committee is co-chaired by the Head of Asset Management and the Chief Executive Officer of Danica. Its members include senior executives such as the Head of Responsible Investment, Head of Group Sustainability, and the Chief Investment Officer in Asset Management. Additionally, it includes non-voting members from the second line of defence, who are tasked with reviewing and challenging the committee's decisions.

ESG Integration Council

The ESG Integration Council serves as an advisory body to the Responsible Investment Committee, with a primary focus on embedding sustainability considerations into investment processes in Danica and Danske Bank Asset Management. Its mandate includes endorsing recommendations for responsible investment of environmental, social and governance (ESG) criteria. Broadly represented by the heads of investment teams in both organisations, the ESG Integration Council provides valuable insights drawn from close knowledge of investments, supporting the effective integration of ESG factors into investment strategies.



Responsible Investment team

To advance Danske Bank’s responsible investment initiatives and enable robust integration of ESG factors across all relevant investment processes, Danske Bank Asset Management has an established Responsible Investment team comprising dedicated analysts and specialists with diverse academic backgrounds, including engineering, economics, political science, and environmental science. All team members are certified ESG analysts.

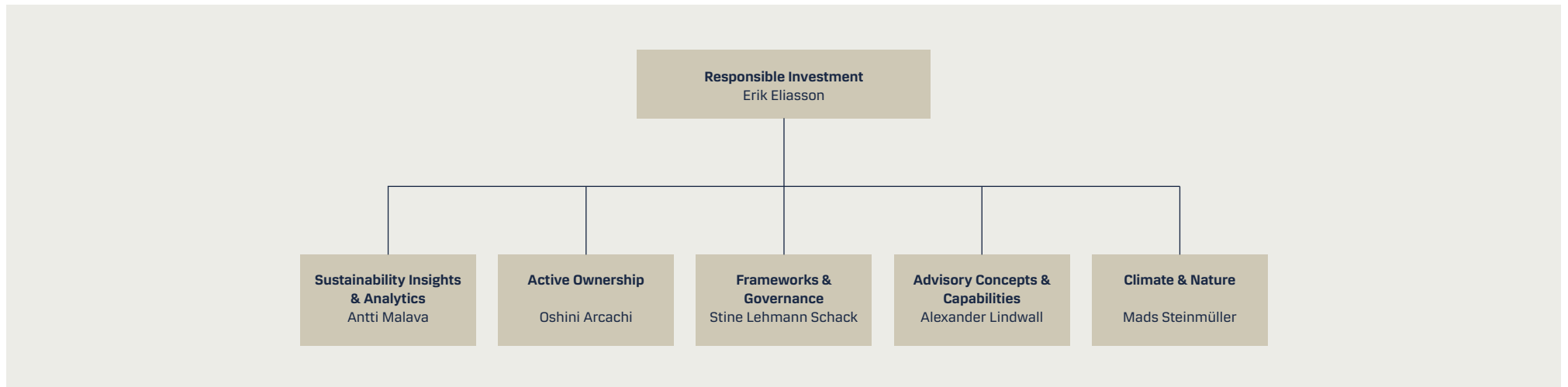
The team is structured into five specialised sub-teams: Sustainability Insights & Analytics, Frameworks & Governance, Climate and Nature, Active Ownership, and Advisory Concepts & Capabilities. By collaborating closely with the entire value chain in Danske Bank Asset Management, the Responsible Investment team supports the effective integration of responsible investment practices into investment strategies across all asset classes.

- **Sustainability Insights & Analytics:** This team is responsible for conducting in-depth ESG analyses and developing, as well as maintaining, sophisticated sustainability models. By harnessing data and insights, the team works to

establish a robust foundation for embedding ESG considerations for well-informed investment decision making.

- **Active Ownership:** This team is dedicated to advancing and facilitating active ownership and stewardship practices targeting investee companies and issuers through voting, direct engagements and collaborative initiatives. The framework for active ownership is designed to protect and enhance the value of customers’ investments while advocating for responsible corporate behaviours.
- **Frameworks & Governance:** Tasked with maintaining the Responsible Investment Policy framework, this team oversees governance by structuring committee workflows and ensuring the continuous upkeep of policy documentation. The team is overall responsible for the ESG infrastructure, including management of the ESG data platform and screening processes tied to ESG commitments within various strategies, including the Illiquid Alternative Platform. Additionally, the team plays an important role in implementing the regulatory agenda, ensuring compliance and alignment with evolving sustainability regulations.

- **Advisory Concepts & Capabilities:** Focused on enhancing customer experience, Advisory Concepts & Capability develops advisory tools and educational materials tailored to individual sustainability preferences. The team works closely with advisory units and the Sales Organisation to deliver exceptional customer insights and guidance, empowering customers to integrate responsible investment principles into their portfolios. Their efforts ensure alignment with the growing demand for personalised and sustainable investment solutions.
- **Climate and Nature:** This team employs thematic approaches to address pressing challenges related to climate change and biodiversity ensuring a focused and impactful response to environmental priorities. By collaborating closely with the Active Ownership and Sustainability Insights & Analytics teams, the team develops strategies for engagement and reporting, aligning with best practices and global initiatives supported by Danske Bank, such as the Net Zero Asset Managers Initiative.



External recognitions

Among the various external frameworks and recognitions in the field of responsible investment, one stands out in particular: the UN-supported Principles for Responsible Investment (PRI). Established in 2006 with support from the United Nations, the PRI guides over 5,000 signatory institutions, managing more than US \$120 trillion in assets¹, in addressing long-term risks and aligning their investments with broader societal objectives.

At Danske Bank Asset Management we recognised the value of the PRI early on and became a signatory in 2010.

An important aspect of the membership is the yearly assessment report that the PRI compiles, which results in a thorough

review of our responsible investment activities. The review and associated scores are based on a questionnaire where signatories respond to hundreds of questions covering many material aspects of responsible investment activities. In the 2025 PRI assessment published in November, we improved our overall scores in seven categories and now have six categories in the five-star range, up from four categories the previous year.

We view the improved scores as a testament to the strength of our responsible investment practices and continued focus to enhance processes and offerings within this dynamic field.

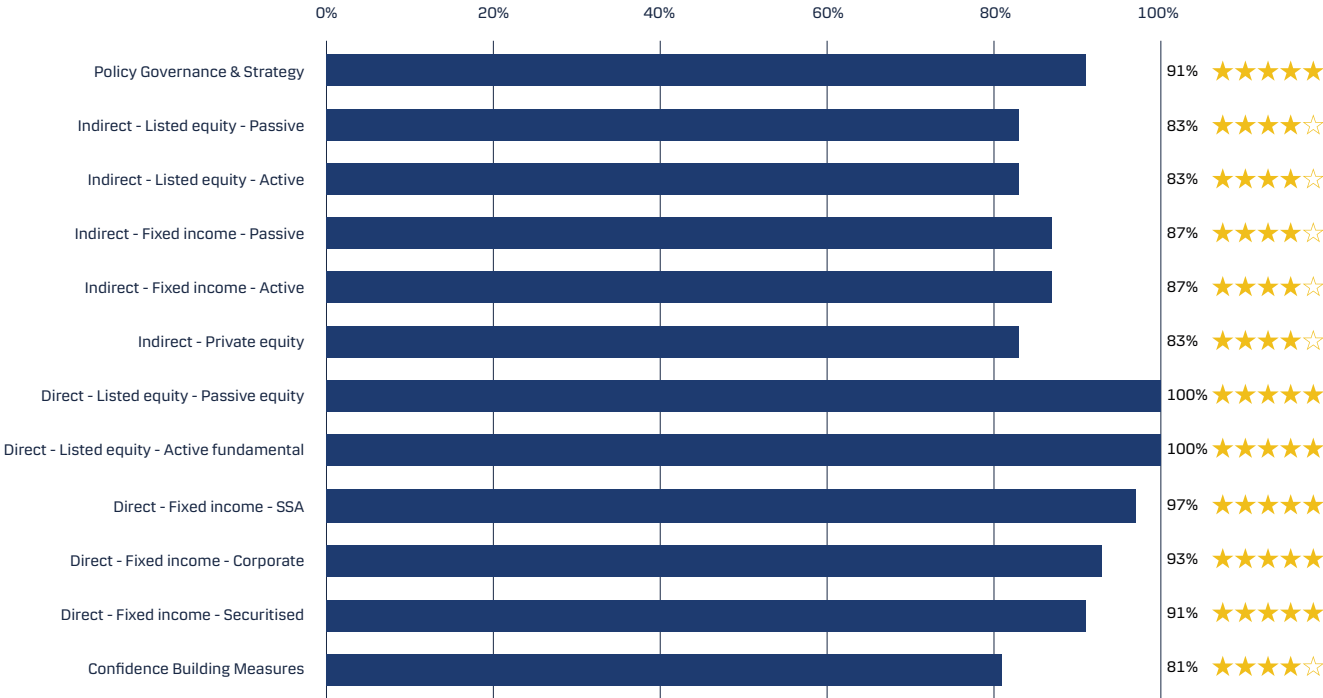
During last year, the Responsible Investment Brand Index (RIBI™) published its 2025 assessment. The institute evaluates over 600 asset managers worldwide through “their ability to translate commitment to responsible investment into brand”²

Danske Bank performed strongly in the RIBI™ 2025 assessment, achieving a Top Rating in three categories:

- Avant Gardist
- Top 10 Scandinavia
- Top 10 Mid-Tier (AUM > €20bn < €100bn)

The Avant Gardist rating means that Danske Bank is “Above average on Commitment rating and Brand rating”
Read more [here](#)

UN Principles for Responsible Investment (UNPRI) 2025 assessment of Danske Bank’s Responsible Investment practices



6
The number of categories where we have a five-star rating from PRI

7
The number of categories where we improved our absolute PRI score compared to previous assessment in 2024

¹ Press Release Template ² RIBI 2025 - Responsible Investment Brand Index (RIBI)

Nordic collaboration through Sustainable Investment Forums

Our memberships in the various Sustainable Investment Forums (SIF) across the Nordic region play an essential role in promoting responsible investment practices within the broader investment community. Through knowledge sharing, networking, education, and events, we collaborate with key peers and stakeholders in the Nordic region and beyond.

Denmark

We serve as a board member of Dansif, where in 2025, among other activities, we played a significant role in organising and planning the Dansif Human Rights Network. This initiative, undertaken in collaboration with the Danish Institute for Human Rights, aimed to foster dialogue and collaboration among investment professionals on human rights issues.

Sweden

Danske Bank Asset Management is also a board member of Swesif. In 2025, Swesif hosted the annual NordicSIF conference, which focused on "The Future of .Humanity". Here, Head of Active Ownership, Oshni Arachchi, participated in a panel discussion

titled "The Nordic JEDI Warrior". Oshni also delivered a presentation on "Active Ownership Trends for 2025" during Swesif's General Meeting Session.

Norway

Norsif's seminar landscape in 2025 featured Chief ESG Analyst Thomas Jakobsen Fladby, who joined a panel discussion at an event co-hosted by Norsif and the Norwegian Defence Research Establishment. The seminar centred on examining and approaching the defence industry from a responsible investment perspective.

Finland

In Finland, Danske Bank Asset Management holds the Chairmanship of the Finsif board. Head of Sustainability Insights & Analytics, Antti Malava, participated in several Finsif events in 2025, including "Data That Is Not Found in a Third-Party Database" and "Does Sustainability Pay Off? From Cost to Value Creation". Additionally, Head of Active Ownership Oshni Arachchi joined a panel discussion on "Active Ownership - Long-Term Impact and Results".



Transparency and Disclosures

Transparency is fundamental to our approach to responsible investment. We are committed to providing our customers and stakeholders with clear, accessible and comprehensive information about our responsible investment practices, policies and performance.

Policies and governance documents

Our Responsible Investment Policy sets out the overarching framework for how we integrate sustainability considerations into our investment processes. Supporting this policy are our Sustainability Risk Integration Instruction, Exclusion Instruction, Inclusion Instruction, Active Ownership Instruction, Voting Guidelines, Engagement Guidelines, and the methodology papers underpinning our Enhanced Sustainability Standards screening, Sustainable Investment approach and fossil fuel investment approach.

Regulatory and statutory disclosures

In accordance with applicable regulations, we publish a range of statutory disclosures including our Principal Adverse Impact Statement, our SFDR entity-level disclosures, and product-level sustainability disclosures for our investment funds classified under Articles 8 and 9 of the Sustainable Finance Disclosure Regulation (SFDR). Our Sustainability Statements are embedded in the Danske Bank Annual Report, and our climate-related disclosures are set out in the Climate Progress Report, aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

Annual reports and progress reports

We publish an annual Responsible Investment Report (this report), the Climate Progress Report, the Human Rights Report, and the Modern Slavery Act Statement. These reports provide detailed accounts of our activities, progress and performance across our key focus areas of climate, biodiversity and human rights. Voting records and engagement summaries are also made publicly available.

Research and thought leadership

As part of our commitment to advancing the understanding of sustainability in investment, we regularly publish white papers and research reports. Recent publications include *Navigating Sustainability: The Role of Management Quality in Enhancing Companies' Carbon Performance from a Nordic Perspective*, *Navigating Biodiversity - A Review of 100 Nordic Companies*, *Water the Investment Risk?*, *Climate and Nature Talk in Nordic Earnings Calls*, and *Welcome to the Jungle*. These and other publications are available on our homepage.

To access our Responsible Investment disclosures and reports please visit <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>



Abbreviations

AUM	Assets Under Management
CESGA	Certified ESG Analyst
COP	Conference of the Parties
CTB	Climate Transition Benchmark
ECRA	EFFAS Certified Climate Risk Analyst
EFFAS	European Federation of Financial Analysts Societies
ESG	Environmental, Social, and Governance
ESGAIA	ESGAIA (now Glass Lewis)
EU	European Union
GHG	Greenhouse Gas
ICDP	Investor Coalition for Deforestation Prevention
ILO	International Labour Organization
IIGCC	Institutional Investors Group on Climate Change
IPDD	Investor Policy Dialogue on Deforestation
ISS	Institutional Shareholder Services
NATO	North Atlantic Treaty Organization
NZAM	Net Zero Asset Managers Initiative
OECD	Organisation for Economic Co-operation and Development
PAB	Paris Aligned Benchmark
PAI	Principal Adverse Impact(s)
PBAF	Partnership for Biodiversity Accounting Financials
PCAF	Partnership for Carbon Accounting Financials
PRI	Principles for Responsible Investment
RIBI™	Responsible Investment Brand Index
SDG	Sustainable Development Goal(s)
SFDR	Sustainable Finance Disclosure Regulation
SIF	Sustainable Investment Forum
SIIC	Sustainable and Impact Investments International Conference
TCFD	Task Force on Climate-related Financial Disclosures
TNFD	Taskforce on Nature-related Financial Disclosures
TPI	Transition Pathway Initiative
UN	United Nations
UNGC	UN Global Compact
WACI	Weighted Average Carbon Intensity

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Please refer to the prospectus and the Key Information Document (KID) before making any final investment decision.

These documents are available free of charge in Danish here. A summary of investor rights is available here. The decision to invest in a fund should take into account all the characteristics of the fund, including its environmental and/or social characteristics, as described in the prospectus. The fund may not be available for sale in all jurisdictions.

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