

Erklæring om vesentlige negative konsekvenser av investeringsbeslutninger på bærekraftsfaktorer

30. juni 2025

Finansmarkedsaktør Nordea Bank Abp (LEI: 529900ODI3047E2LIV03)

Sammendrag

Nordea Bank Abp (LEI: 529900ODI3047E2LIV03) vurderer vesentlige negative konsekvenser av dets investeringsbeslutninger på bærekraftsfaktorer. Denne erklæringen er den konsoliderte erklæringen om vesentlige negative konsekvenser på bærekraftsfaktorer for Nordea Bank Abp¹. Nordea Bank Abp har delegert forvaltningsfunksjonen for de diskresjonære porteføljene det forvalter, til Nordea Investment Management AB, som sammen henvises til som «vi», «oss» eller «vår». Følgelig blir de viktigste negative effektene av investeringsbeslutninger som tas på vegne av disse porteføljene, inkludert i vurderingen av de viktigste negative effektene på nivået til Nordea Investment Management AB. Diskresjonære porteføljer som forvaltes internt av Nordea Bank Abp er ikke inkludert i denne erklæringen.

Denne erklæringen om vesentlige negative konsekvenser på bærekraftsfaktorer dekker referanseperioden 1. januar til 31. desember 2024.

Vi tar hensyn til vesentlige negative konsekvenser i due diligence-prosessen og -prosedyrene for investeringer. På enhetsnivå vurderer vi vesentlige negative konsekvenser ved å måle og overvåke de samlede negative konsekvensene av investeringene våre på bærekraftsfaktorer. Vi vurderer de obligatoriske indikatorene for vesentlige negative konsekvenser og to frivillige indikatorer som er definert i EUs offentliggjøringsforordning (SFDR)², med forbehold om datatilgjengelighet og -kvalitet. Denne erklæringen omfatter de rapporterte vesentligste negative konsekvensene av investeringene våre målt i henhold til disse indikatorene. På grunn av manglende krav om rapportering av obligatoriske data for investeringsobjekter har vi fremdeles utfordringer med å identifisere alle vesentlige negative konsekvenser av investeringene våre.

Verdiene for vesentlige negative konsekvenser som presenteres i denne erklæringen på enhetsnivå, er utledet av midlene til forvaltning for produkter som forvaltes av Nordea Bank Abp, og tilsvarer summen av de underliggende aktivaene i disse produktene. De samlede verdiene for vesentlige negative konsekvenser i denne

¹ Denne erklæringen gjelder fra og med 30. juni 2025. Den vil bli gjennomgått og oppdatert minst årlig. Hvis det er uoverensstemmelse i oversettelser av denne erklæringen, er det den engelske versjonen som gjelder.

² Europaparlaments- og rådsforordning (EU) 2019/2088 av 27. november 2019 om bærekraftsrelaterte opplysninger i finanssektoren.

erklæringen, kombinert med de overordnede markedsforholdene, er derfor primært drevet av kundenes investeringsmål og -preferanser, som igjen påvirker valget deres av investeringsprodukter (og dermed underliggende porteføljebeholdninger og tilhørende vektinger).

Det er vanskelig å sammenligne investeringenes vesentlige negative konsekvenser med referanseverdier for bransjen på grunn av forskjellene mellom porteføljene våre (aktivaklasse, instrumenter, sektoreksponering osv.). Endringer i datadekningen i perioden begrenser dessuten muligheten til å sammenligne verdiene for vesentlige negative konsekvenser i denne erklæringen fra år til år, særlig for verdier der datadekningen er lav. Derfor kan selv mindre endringer i den absolutte datadekningen (f.eks. fra 3 % til 4 %) føre til store relative endringer i de rapporterte verdiene.

Klimaendringer utgjør en stor trussel mot verdensøkonomien og medfører spesifikke risikoer for selskapene og andre enheter vi investerer i. Å redusere klimapåvirkningen fra investeringene våre er derfor en sentral del av ESG-strategien vår (miljø, samfunnsansvar og eierstyring), sammen med andre viktige områder som biologisk mangfold, beskyttelse av vannressurser, menneskerettigheter og god eierstyring. Dette gjenspeiles i prioriteringene som er satt for påvirkningsarbeidet vårt og forpliktelsene våre. Vi gjør fortløpende vurderinger av klimaendringsrisikoer og hvordan omstillingen til en lavkarbonøkonomi påvirker ulike sektorer og selskaper.

Denne erklæringen inneholder også en beskrivelse av tiltak som er iverksatt, tiltak som er planlagt og mål som er satt for å prøve å redusere og dempe vesentlige negative konsekvenser av investeringene våre.

Vurdering av vesentlige negative konsekvenser er beskrevet mer detaljert i retningslinjene og prosessene våre for aktivt eierskap, aktiv investering og påvirkningsarbeid. Arbeidet vårt med aktivt eierskap omfatter dialog, stemmegivning ved fullmakt, deltakelse på generalforsamlinger og bidrag til utviklingen av ESG-bransjestandarder.

Description of the principal adverse impacts on sustainability factors

The mandatory and voluntary principal adverse impact indicators required by the EU Delegated Regulation 2022/1288 are set out in tables below. We report on 20 adverse impact indicators, of which 18 are mandatory and 2 are voluntary. For these indicators, we have included information to describe the actions that we have taken and actions that we plan to take/targets set to avoid or reduce the identified principal adverse impact. Our engagements are undertaken on the level of Nordea Asset Management (NAM), which includes Nordea Investment Management AB, Nordea Investment Funds S.A. and Nordea Funds Ltd. References in this statement to engagements carried out and number of issuers identified as outliers on indicators therefore relate to the combined portfolio holdings managed by these entities.

We have included the reported principal adverse impact of our investments, measured using these indicators, for the reference period from 1 January to 31 December 2024.³

³ The reported impact does not include impact of certain holdings for which data is not available and could not be obtained on a best effort basis or be estimated. The basis for our calculations of impact is the methodologies set out in the SFDR regulatory technical standards (Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 (the SFDR RTS)).

Table 1

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact 2024 (year n)	Impact 2023 (year n -1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	970 158,86 tCO ₂ e Data coverage: 85,58%	952 557,27 tCO ₂ e	GHG emissions are calculated as the Scope 1 ⁴ emissions in investee companies expressed in tons of carbon dioxide equivalent.	We are a signatory to the Net Zero Asset Managers Initiative and committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. In relation to this, we have an organisational-wide target to achieve a 50% reduction in the weighted average carbon intensity (WACI) of our investments (Scope 1+2 tCO ₂ e/mEur revenue) and a 2025 target to ensure that 80% of our top 200 largest carbon footprint contributors are on a Paris- aligned trajectory or else subject to engagement to become aligned.
		Scope 2 GHG emissions	244 963,05 tCO ₂ e Data coverage: 85,58%	237 520,15 tCO ₂ e	GHG emissions are calculated as the Scope 2 ⁵ emissions in investee companies expressed in tons of carbon dioxide equivalent.	
		Scope 3 GHG emissions	7 291 350,44 tCO ₂ e Data coverage: 85,58%	7 271 120,06 tCO ₂ e	GHG emissions are calculated as the Scope 3 ⁶ emissions in investee companies expressed in tons of carbon dioxide equivalent.	
		Total GHG emissions	8 506 452,43 tCO ₂ e ^{7,8}	8 461 587,64 tCO ₂ e	The reported impact for total GHG emissions include the Scope 1, 2 and 3 GHG emissions	

⁴ Scope 1 emissions are direct emissions generated from sources that are controlled by the investee company.⁵ Scope 2 emissions are indirect emissions from purchased or acquired energy (including electricity, steam, heat and cooling) generated off-site and consumed by the investee company.⁶ Scope 3 emissions are all indirect emissions that occur in the value chain of an investee company (including business travel, capital goods and processing of sold products).⁷ Total Scope 1+2 GHG emissions: 1 215 121,91 tCO₂e⁸ Total Scope 1+2+3 GHG emissions: 8 506 472,35 tCO₂e

			Data coverage: 85,58%		expressed in tons of carbon dioxide equivalent.	reductions in Scope 1, 2 and 3 PAI indicators over time. In 2024 NAM strengthened its Responsible Investment Policy related to coal activities, including stronger investment restrictions on coal mining, coal power expansion, and generation without phase-out commitments. From 2023 to 2024, NAM's carbon intensity (scope 1+2) was reduced by 9.5%. By the end of 2024, 81% of top-200 carbon footprint contributors were aligned or subject to active engagement to become aligned with the Paris agreement. We engaged with 65 companies on methane, 5 companies joined the Oil and Gas Methane Partnership 2.0, and we voted on 127 climate management and shareholder proposals (69%). Going forward we will continue engagement efforts to encourage Paris alignment of investee companies, enhance existing suite of climate-related tools and continue to introduce additional investment products with climate overlays. In addition, as from 2025, certain investment products apply Paris-aligned benchmark exclusions (PAB) that limit exposure to the fossil fuel sector.
	2. Carbon footprint	Carbon footprint	272,23 tCO2e/million EUR invested ⁹ Data coverage: 85,58%	310,78 tCO2e/million EUR invested ¹⁰	Carbon footprint is calculated as the total GHG emissions expressed as a ratio for the value of all investments. The reported impact include Scope 1, 2 and 3 GHG emissions.	
	3. GHG intensity of investee companies	GHG intensity of investee companies	733,80 tCO2e/million EUR of owned revenue ¹¹ Data coverage: 86,14%	765,55 tCO2e/million EUR of owned revenue ¹²	The reported impact for include Scope 1, 2 and 3 emissions.	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	4% investments in fossil fuels Data coverage: 83,68%	4% investments in fossil fuels	Companies active in the fossil fuel sector means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels.	

⁹ Carbon footprint including scope 1+2 GHG emissions: 38,88 tCO2e/million EUR invested.

¹⁰ Carbon footprint including scope 1+2 GHG emissions: 43,72 tCO2e/million EUR invested.

¹¹ GHG intensity including scope 1+2 GHG emissions: 80,15 tCO2e/million EUR of owned revenue.

¹² GHG intensity including scope 1+2 GHG emissions: 95,58 tCO2e/million EUR of owned revenue.

	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	60% non-renewable energy consumption Data coverage : 74,95% 59% non-renewable energy production Data coverage : 2,26%	64% non-renewable energy consumption 64% non-renewable energy production	Renewable energy sources means renewable non-fossil sources such as wind, solar and geothermal energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas. Non-renewable energy sources means energy sources other than those referred to above.	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Sector A: 0,55 GWh/million EUR of revenue Sector B: 1,49 GWh/million EUR of revenue Sector C: 0,26 GWh/million EUR of revenue Sector D: 3,00 GWh/million EUR of revenue Sector E: 0,98 GWh/million EUR of revenue Sector F: 0,09 GWh/million EUR of revenue	Sector A: 0,46 GWh/million EUR of revenue Sector B: 2,03 GWh/million EUR of revenue Sector C: 0,37 GWh/million EUR of revenue Sector D: 3,76 GWh/million EUR of revenue Sector E: 0,81 GWh/million EUR of revenue Sector F: 0,11 GWh/million EUR of revenue	Energy consumption intensity means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company. Impact is reported for the below high impact climate sectors. Sector A: Agriculture, forestry and fishing Sector B: Mining and quarrying Sector C: Manufacturing Sector D: Electricity gas steam and air conditioning supply Sector E: Water supply sewerage waste management and remediation activities Sector F: Construction Sector G: Wholesale and retail trade repair of motor vehicles and motorcycles	

			Sector G: 0,10 GWh/million EUR of revenue Sector H: 0,93 GWh/million EUR of revenue Sector L: 0,33 GWh/million EUR of revenue Data coverage: Sector A: 0,08% Sector B: 1,04% Sector C: 23,83% Sector D: 1,95% Sector E: 0,39% Sector F: 0,97% Sector G: 3,96% Sector H: 1,14% Sector L: 1,86%	Sector G: 0,25 GWh/million EUR of revenue Sector H: 0,94 GWh/million EUR of revenue Sector L: 0,31 GWh/million EUR of revenue	Sector H: Transportation and storage Sector L: Real estate activities GWh or gigawatt hours, is a unit of energy representing one billion (1 000 000 000) watt hours.	
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Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	1,6% with negative impact Data coverage: 83,37%	1,1% with negative impact	Biodiversity-sensitive areas means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas, as well as certain other protected areas.	We are a member of the Finance for Biodiversity Pledge, a commitment of financial institutions to protect and restore biodiversity through finance activities and investments. We commit to take potential negative effects on biodiversity into consideration. Where possible, we engage individually or collaboratively with companies deemed to be outliers on biodiversity. We are involved in several initiatives to protect biodiversity such as NA100. More information on these initiatives can be found in our White paper on Biodiversity and Nature, available on our website. We consider the impact on biodiversity of our investment decisions using an internally developed monitoring system. Issuers identified as outliers on the biodiversity indicator or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. During the year, we identified 50 active outliers on this PAI (on parent company level). We initiated 2 new engagements based on active PAI outliers and had 4 additional engagements which were still ongoing based on outliers from the previous year that remained active in 2024. Furthermore, there were 7 companies which were active outliers during the year where we were already addressing the issue or had addressed another material topic either individually or through a collaborative engagement and thus did not proceed with further action on the particular PAI. In addition, one company was excluded following an assessment of their impact.
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Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0,05 tons/million EUR invested Data coverage: 2,78%	0,05 tons/million EUR invested	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise value of the investee company.	We consider emissions to water generated by investee companies using an internally developed monitoring system. Issuers identified as outliers on the emissions to water indicator or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. One company was identified as an outlier during the year and following further analysis, no further action was taken. Due to the current low data coverage in respect of this indicator, the impact may not reflect emissions to water in the overall product portfolio and it is currently not deemed meaningful to set specific targets in relation to the indicator. We take part in different initiatives encouraging investee companies to increase disclosure on water-related indicators.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	57,58 tons/million EUR invested Data coverage : 82,31%	59,29 tons/million EUR invested	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise value of the investee company. Due to improved coverage of issuers, and changes in the methodology of one of our data providers in relation to the classification of mining tailings and waste rock as hazardous, unless explicitly reported otherwise, a significant increase in the	We consider the hazardous waste and radioactive waste ratio generated by investee companies using an internally developed monitoring system. Issuers identified as outliers on the indicator or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. No company was identified as an outlier during the year.

					hazardous and radioactive waste indicator is observed.	
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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1,41% involved in violations Data coverage: 85,58%	0,8% involved in violations	Information on investee companies involved in violations of the UNGC principles or OECD Guidelines are based on our norms-based screening.	We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms. Our investments are subject to norm-based screening, which identifies investee companies that have been involved in violations of the UN Global Compact principles or OECD Guidelines for Multinational Enterprises. If a company is identified in this screening process, an internal assessment of the company is initiated and potential actions considered, as further described below. During 2024, 13 issuers were flagged for allegations of violating international norms. In depth engagement processes were conducted with 5 of the issuers. NAM co-filed shareholder resolutions for one of the issuers' 2024 AGM.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee 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	0,14% without policies Data coverage: 84,95%	0,2% without policies		We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms. To assess compliance with UN Global Compact principles and OECD Guidelines for Multinational

		Guidelines for Multinational Enterprises				Enterprises, we monitor the share of investments in investee companies without processes and compliance mechanisms. This is done for all managed assets on an ongoing basis using an internally developed monitoring system. Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. During 2024, 75 issuers were identified as outliers on this indicator. All these issuers were assessed and 21 of them were selected for further engagement.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	13% pay gap Data coverage: 49,70%	9% pay gap	Unadjusted gender pay gap means the difference between average gross hourly earnings of male paid employees and of female paid employees as a percentage of average gross hourly earnings of male paid employees.	We consider the average unadjusted gender pay gap of investee companies, subject to data quality and availability, using an internally developed monitoring system. Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. The objective is to engage with companies to improve disclosure on this topic to improve coverage.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	36% female directors/ total directors Data coverage: 82,38%	36% female directors/ total directors		We consider the average ratio of female to male board members, expressed as a percentage of all board members in investee companies, subject to data quality and availability, using an internally developed monitoring system. Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. We aim for

						a 40/60 split when it comes to gender representation and actively participate in owner-led nomination committees and use our voting rights to progress towards this. During 2024, we initiated an engagement addressing board gender diversity in 56 issuers, which had no female board members. By the end of the year 18 of the companies had added at least one female board member.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0% involvement	0% involvement		Our Nordea-branded investment strategies do not invest in companies that are involved in the production or development of cluster munitions, anti-personnel mines, biological weapons, chemical weapons, weapons with non-detectable fragments, incendiary and blinding laser weapons or depleted uranium munitions. Our Nordea-branded investment strategies do not invest in companies that are verified to be involved in the production of nuclear weapons. Our holdings are screened on an ongoing basis for exposure to controversial weapons. If such holding is detected, we conduct further analysis which is presented to the Responsible Investment Committee who decides how to proceed and any actions to take (e.g. engagement or exclusion). At the end of 2024, NAM had excluded a total of 91 issuers due to their involvement with controversial weapons. Two of these issuers were excluded during 2024.

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact 2024 (year n)	Impact 2023 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	328,40 tCO2e/million EUR of owned GDP Data coverage: 6,70%	281,18 tCO2e/million EUR of owned GDP	The GHG intensity of investee countries is expressed in tons of carbon dioxide equivalent.	We are a signatory to the Net Zero Asset Managers Initiative and committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. In relation to this, we have an organisational-wide target to reduce the weighted average carbon intensity (WACI) of our investments, as well as a set of portfolio-specific carbon footprint reduction targets. In addition, we have set a complementary target to ensure that individual companies are engaged to become 1.5°C aligned. Going forward we will continue to conduct policy engagement where relevant, which are activities focused on public policy dialogues with governments as well as public authorities on specific ESG issues. During 2024 we have continued to take part of the Investor Policy Dialogue on Deforestation (IPDD), which is an investor-led sovereign engagement initiative that aims to halt deforestation. We will work to continuously enhance data coverage and calculation capabilities to enable monitoring of this indicator.

Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	Absolute number: 0 investee countries subject to violations Relative number: 0,3% investee countries subject to violations Data coverage: 6,68%	Absolute number: 2 investee countries subject to violations Relative number: 1,5% investee countries subject to violations		We adhere to investment restrictions applicable further to sanctions imposed by the EU, UN and US. Sovereign bonds are also assessed on their Human Rights performance using our proprietary methodology, which is based on the United Nations Universal Declaration of Human Rights and other recognised standards. We will work to continuously enhance data coverage and calculation capabilities to enable monitoring of this indicator. During 2024, 18 issuers were identified as outliers on this indicator. NAM had engagements with 5 of these issuers.
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Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact 2024 (year n)	Impact 2023 [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	Not applicable as we do not directly invest in real estate.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	Not applicable as we do not directly invest in real estate.

Other indicators for principal adverse impacts on sustainability factors

In addition to the indicators set out above, we consider the two additional indicators included in the tables here below, subject to data availability and quality.

Table 2

Additional climate and other environment-related indicators

Adverse sustainability indicator		Metric	Impact 2024 (year n)	Impact 2023 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies						
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Water, waste and material emissions	8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high water stress without a water management policy	0,0% exposure to areas of high water stress Data coverage: 62,89%	0,1% exposure to areas of high water stress	Areas of high water stress means regions where the percentage of total water withdrawn is high (40-80 %) or extremely high (greater than 80 %) in the World Resources Institute's (WRI) Water Risk Atlas tool 'Aqueduct'.	We consider the exposure to areas of high water stress of investee companies by using an internally developed monitoring system. Issuers identified as outliers on the exposure to areas of high water stress indicator or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions, as further described below. During the year, we had 13 companies which were active outliers on the exposure to high water stress indicator. We engaged with one company following further analysis and no action was initiated on the remaining companies.

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS					
Adverse sustainability indicator	Metric	Impact 2024 (year n)	Impact 2023 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies					
Human Rights	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis Data coverage: 83,37%	0,51% identified cases on a weighted average basis 0,77% identified cases on a weighted average basis	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise value of the investee company.	We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms. Our investments are subject to norm-based screening, which identifies investee companies that have been involved in violations of the UN Global Compact principles or OECD Guidelines for Multinational Enterprises. If a company is identified in this screening process, an internal assessment of the company is initiated and potential actions considered, as further described below. During 2024, 13 issuers [were flagged for allegations of violating international norms. In depth engagement processes were conducted with 5 of the issuers.

We consider these additional indicators, subject to data availability and quality, using an internally developed monitoring system. Issuers identified as outliers on any of the indicators or which exhibit high adverse impact across several indicators may be subject to further analysis and the process described below.

We do not use other indicators to identify and assess additional principal adverse impacts on a sustainability factor than the indicators set out above.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

The SFDR defines sustainability factors as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Principal adverse impact (PAI) is generally understood to mean the negative impact, caused by an investment decision or investment advice, on these factors. The SFDR includes a set of specific indicators that can be used to measure an issuer's or investee company's negative impact on sustainability factors, to enable identification of the principal adverse impact of investments by a financial market participant.

We have implemented certain safeguards to ensure that our investments meet minimum ESG standards. When applicable, our ESG safeguards include application of exclusion lists and norm-based screening. By applying general screening criteria pre-investment, we aim to limit investing into companies with negative impact on sustainability factors. Additionally, to identify, manage and mitigate principal adverse impact where relevant, we integrate PAI considerations in our investment decision-making process. Identification of high negative impact on environmental and social factors results in further analysis and may be a driver for active ownership activities, including voting and engagement, as a mean to mitigate that impact. High negative impact on sustainability factors may ultimately lead to divestment.

We consider PAI on entity level by measuring and monitoring the aggregated negative impact on sustainability factors of our investments.¹³

Monitoring of PAI is subject to data availability and quality.

Selection of indicators

Our Responsible Investment Policy describes the framework governing our approach to responsible investments and ESG/sustainability. Our ESG strategy identifies four core areas of interest:

- Climate
- Human rights
- Good corporate governance

¹³ It should be noted that the level of principal adverse impact consideration may differ depending on the financial product's strategy. We report on the principal adverse impact of all of our financial products, subject to data availability and quality.

- Biodiversity

These core areas of interest are linked to PAI indicators: 1.1 (GHG emissions), 1.2 (Carbon footprint), 1.3 (GHG intensity of investee companies), 1.4 (Exposure to companies active in the fossil fuel sector), 1.5 (Share of non-renewable energy consumption and production), 1.6 (Energy consumption intensity per high impact climate sector), 1.7 (Activities negatively affecting biodiversity-sensitive areas), 1.8 (Emissions to water), 1.15 (GHG intensity) and 2.8 (Exposure to areas of high water stress).

These four core areas of interest have been identified as such due to the severe long-term consequences, that adverse impact may have on these matters and the systemic risk they pose. We have developed certain ESG positions around these four core areas to describe the requirements that we have on investee companies in relation hereto. The PAI indicators that we consider are aligned with our ESG positions and are subject to data quality and availability. Our ESG positions are further described in our Responsible Investment Policy.

Considering principal adverse impact of investment decisions, i.e. the environmental and social impact of our activities, and sustainability risk, i.e. material negative impact of ESG issues on the value of investments, captures the full scope of the double materiality concept. Information on how we integrate sustainability risk in the investment decision-making process is available [here](#).

Identification and assessment of PAI

Principal adverse impact assessment is integrated in our active ownership and engagement policies and processes and can be summarised as set out below.

As a starting point, we apply norm-based screening filters to identify companies that are allegedly involved in breaches of international law and norms on environmental protection, human rights, labour standards and anti-corruption. These filters identify impact relating to some of the PAI indicators. To identify impact of our investment decisions across all the mandatory and the additional PAI indicators that we have chosen to consider, we have developed a proprietary PAI monitoring system (PAI engine).

The PAI engine is based on data acquired from third-party providers and investee companies. By ranking the performance of companies across each indicator, we aim to identify each company's negative impact on climate and social issues as defined by the PAI metrics, both in absolute and relative terms (e.g. compared to peers). We measure the overall exposure on entity level as well as the impact on product level, subject to data availability.

Companies identified by the PAI engine as outliers on specific indicators or that exhibit high adverse impact across several indicators, are analysed further by our Responsible Investment team and a recommendation for action is made to our Responsible Investment Committee (RIC). RIC is presented with an update on the identified company on a quarterly basis and may, based on this, decide on the appropriate action to be taken in each case.¹⁴

The possible actions are the following:

No action: The PAI indicator level of the investee company is deemed acceptable or judged not to reflect the actual ongoing performance of the company, and no further action is deemed necessary. The investee company will continue to be assessed on an ongoing basis.

Engagement: Companies that have been flagged as having a high adverse impact on one or across several PAI indicators may be identified as candidate for an engagement case. Engagement may also be initiated due to other reasons such as the issuer's overall PAI performance, material exposure to one of our four core areas of interest (listed above), identification in norms-based screening, or low data coverage for the investee company compared to benchmark. Reasons for, and scope of, engagement activities is further described below. The Responsible Investment team engages with the investee company and tracks performance after the engagement, based on relevant engagement key performance indicators. Our engagement with investee companies is further described in the "Engagement policies" section below.

Exclusion: The investee company is deemed not eligible for investments across our portfolios and is added to our exclusion list. Addition to the exclusion list may be due to the identification of high negative adverse impact on sustainability factors in the PAI engine as described above. It may also be due to the investee company's sector being deemed incompatible with our ESG strategy. Exclusion is generally considered as the option of last resort as we believe that engagement is more efficient to positively influence the issuer to move in the right direction. Our exclusion list is available [here](#).

In deciding the appropriate action, the RIC considers, among other things, the severity and scope of individual adverse impacts, and the probability of occurrence and severity of adverse impacts, including their potentially irremediable characteristics. For more information, please refer to our [Responsible Investment Annual Report](#) and our [Responsible Investments Policy](#).

Our active ownership efforts also include proxy voting, attending annual general meetings, contributing to the development of industry ESG standards and the filing of shareholder resolutions. We vote in as many annual general meetings as practically possible, and prioritise votes related to the four core areas of interest defined in our ESG strategy (listed above) and further described in the "Engagement policies" section below.

¹⁴ Descriptions of actions taken under our active ownership and engagement policies and processes are referring to actions taken on behalf of the funds managed by Nordea Investment Funds S.A. and Nordea Funds Ltd. Depending on specific client requests, such actions may also be taken on behalf of clients to whom Nordea Investment Management AB provide portfolio management services, subject to the individually negotiated agreements.

Details of our voting activities via the fund companies can be accessed via our [voting portal](#).

Margin of error with our methodologies

The methodology to identify PAI is always subject to data availability and quality. We are reliant on the quality of data received from investee companies and third-party data providers. To the extent possible, data reported by investee companies is prioritised. This is done to minimise the reliance on third-party estimations, contributing to improving the overall quality of the data we use as input in our investment and active ownership processes.

Where reported data is not available or of adequate quality, we use proxy data provided by third-party data providers.

A limitation in terms of data availability is that we may not be able to gather the same level of information about the impact of indirect investments, such as fund-of-fund investments and certain derivatives. The impact reported above does not include impact of certain holdings for which data is not available and could not be obtained on a best effort basis or estimated. We continuously strive to improve data coverage.

Governance in relation to policies

Nordea Investment Management AB's Senior Executive Management has overall responsibility to define the approach to ESG/sustainability. The daily responsibility to implement our Responsible Investment Policy and our active ownership and engagement framework, lies with Nordea Investment Management AB's Responsible Investment team. Nordea Investment Management AB's responsible investment, active ownership and engagement framework is updated at least on an annual basis. Information on our engagement policies is set out on [nordea.com](#)

Data sources

Our PAI engine applies a range of data, including values, scores and weights sourced from investee companies and several third-party data providers including MSCI and ISS. For a given indicator, multiple data sources may be used. For each indicator data source, third-party data providers are selected based on data quality assessments. The indicator importance is prioritised according to parameters reviewed and maintained by ESG analysts in Nordea Investment Management AB's Responsible Investment team. These parameters consider various aspects that may impact the performance of the engine, including data quality, data freshness and history, data coverage, aspects of the methodology of the data providers, the materiality of the indicator's subject matter, and divergence of indicator values.

We apply various measures to control the data quality, both third-party and internal. This includes engaging with issuers, both collaboratively and individually, to attempt to improve disclosure and data coverage. The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

More information about the external data sources used is available upon request.

Engagement policies

As described above, we undertake a range of engagement activities with investee companies and issuers. The purpose is to influence and encourage improved ESG practices, enhance sustainable long-term financial performance and to seek to mitigate adverse impact on sustainability factors.

Nordea Investment Management AB has adopted an engagement policy under the Shareholder Rights Directive II¹⁵. The purpose of this policy is to describe how we ensure effective and sustainable shareholder engagement and protect shareholder's rights.

Nordea Investment Management's Engagement Policy outlines the general principles for how shareholder engagement is integrated in investment strategies and sets out the different engagement activities that is carried out on behalf of clients where relevant. The Engagement Policy elaborates on general principles that Nordea Investment Management has established for positively influencing investee companies, including improve their corporate governance practices as well as ensuring a more long-term approach. It should however be noted that the application of Nordea Investment Management's Engagement Policy is subject to the individual agreements and negotiated investment guidelines between Nordea Investment Management and its clients. The Engagement Policy is governed by Nordea Investment Management AB and approved by its board, further to recommendation by the Corporate Governance Committee. The Engagement Policy is reviewed on an annual basis and was approved in its current form in 2024.

The scope of our engagement activities includes three main categories: thematic, norms and investment-led. These engagement types may overlap and be applied to a company simultaneously.

Thematic engagements may be undertaken either by us alone or in collaboration with other asset managers and asset owners. Collaborative engagements can take place within the framework of industry initiatives such as Climate Action 100+, Nature Action 100, International Sustainability Standards Board (ISSB), The United Nations Principles for Responsible Investment (PRI), CDP or Investor Alliance for Human Rights, or through ad hoc initiatives. We will in some cases initiate and lead such ad hoc investor alliances. Our thematic engagements will typically concern issues under one of the core areas of interest identified in our ESG strategy, as described above.

Norms and incident engagements may be triggered by observed norms breaches through the norms-based screening process, or by high negative impact on one or more PAI indicators listed in Tables 1, 2 and/or 3 above.

¹⁵ Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (Shareholder Rights Directive II).

Investment-led engagements may be initiated and executed at the individual investment strategy level. Portfolio managers and the Responsible Investment team may engage proactively with companies when material ESG risks that may not be adequately managed are observed or when opportunities are not deemed to be fully capitalized on. Engagement may also be undertaken to advance certain themes related to the UN Sustainable Development Goals, e.g. human rights and climate change.

We will monitor and review the principal adverse impact of our holdings, as described above, on a yearly basis and adapt targets and measures to mitigate impact as required.

Our voting and engagement activities aim to mitigate principal adverse impact over time. Investee companies identified as a candidate for an engagement case may during the engagement be asked to identify actions taken to reduce emissions or to make certain commitments to measure and report emissions. To ensure that the company is responsive and makes progress, the Responsible Investment team continues to engage with the investee company and tracks performance after the engagement, based on relevant engagement KPIs. If the investee company does not meet the set KPIs in the relevant timeframe, the case may be escalated and additional actions taken. As a last resort, we may consider divesting.

For more information, please refer to the [Engagement Policy](#) and [SRD II Disclosure Report](#) of Nordea Investment Management AB.

Our Responsible Investment Policy and active ownership framework sets out additional detail of our engagement with investee companies.

References to international standards

Our ambition is that the companies that we invest in comply with the international conventions and norms that we adhere to. These include, but are not limited to those listed below with the respective PAI indicator(s) used to measure adherence to the respective standards:

- UN Global Compact
 - 1.10.1 UNGC breaches
- OECD Guidelines for Multinational Enterprises
 - 1.10.1 UNGC breaches
 - 1.11.1 UNGC policy
- UN Guiding Principles on Business and Human Rights
 - 1.10.1 UNGC breaches
 - 1.11.1 UNGC policy
- Universal Declaration of Human Rights

- 1.10.1 UNGC breaches
- Children's Rights and Business Principles
 - 1.10.1 UNGC breaches
- ILO conventions on labour standards
 - 1.10.1 UNGC breaches
- Rio Declaration on Environment and Development
 - 1.10.1 UNGC breaches
- UN Convention on Corruption
 - 1.10.1 UNGC breaches
- Convention on Cluster Munitions
 - 1.14.1 Controversial weapons

We have dedicated resources within the Responsible Investment team and systems to enable measurement of the adherence to these international conventions and norms.

Norm-based screening is used to measure the adherence to all the standards except for the Convention on Cluster Munition (information regarding measurement of the adherence to this standard is detailed below).

Norm-based screening identify companies that have allegedly been involved in breaches of international law and norms on environmental protection, human rights, labour standards and anti-corruption. If a company is identified in this screening process, an internal assessment of the company and the incident is initiated. This is further described above under the heading "Identification and assessment of PAI".

Regarding the Convention on Cluster Munition, our investment restrictions prohibit investment in issuers that operate in specific sectors or are involved in certain activities. We do not invest in companies that are involved in the production or development of cluster munitions, anti-personnel mines, biological weapons, chemical weapons, weapons with non-detectable fragments, incendiary and blinding laser weapons as well as depleted uranium munitions. These restrictions are continuously monitored in our internal limit monitoring system. Pre-trade limits block the unfit investment opportunities and post-trade limits flag exposure or activity that is not aligned with the investment restrictions, which may lead to divestment.

A range of data is used for the above processes, including values, scores and weights sourced from investee companies and several third-party data providers including MSCI and ISS. To the extent possible, data reported by companies, regulatory authorities and/or non-governmental organisations are prioritised over data from data

providers' estimation models. This is done to minimise the reliance on third-party estimations, contributing to improving the overall quality of the data we use as input in our investment and active ownership processes.

Where reported data is not available or of adequate quality, we use proxy data provided by third-party data providers to enable assessment.

As indicated above, we may not be able to gather the same level of information about the impact of indirect investments, such as fund-of-fund investments and certain derivatives. Data coverage for the PAI indicators that align with the above international standards, i.e. the percentage of holdings for which PAI data is available is currently approximately 80-90 per cent. We continuously strive to improve data coverage.

We apply various measures to control the data quality, both third-party and internal.

External data providers and other data sources are assessed by ESG analysts in Nordea Investment Management AB's Responsible Investment team on an ongoing basis for data quality, coverage and other attributes including the methodology used by the data providers.

Paris Agreement

PAI indicators that can be included in the assessment of Paris Agreement alignment: 1.1 (GHG emissions), 1.2 (Carbon footprint), 1.3 (GHG intensity of investee companies), 1.4 (Exposure to companies active in the fossil fuel sector), 1.5 (Share of non-renewable energy consumption and production), 1.6 (Energy consumption intensity per high impact climate sector), 1.15 (GHG intensity).

As a signatory to Net Zero Asset Managers Initiative we are committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. Our short-and mid-term targets work towards this overall ambition, through complementary top-down and bottom-up approaches: from an organisational-wide target to reduce the weighted average carbon intensity (WACI) of investments to a 2025 target to ensure that 80% of our top 200 largest carbon footprint contributors are on a Paris-aligned trajectory, or else subject to engagement to become aligned.

To assess the alignment profile of all companies within our investment universe, we have developed an in-house alignment assessment tool which complements PAI indicators by evaluating a set of forward looking alignment criteria as defined by the [PAI Net Zero Investment Framework](#), established in May 2019. Key data sources include Transition Pathway Initiative, CA100+, Science-Based Targets Initiative and CDP, which are combined to categorise companies into the following categories: Paris aligned, Paris aligning, Committed to aligning or Not aligning.

We have also developed a Climate Risk Assessment methodology that evaluates investee companies by combining current emission performance with forward-looking Paris alignment metrics. This approach assigns companies to one of four categories — low, moderate, high, or very high risk — with the highest risk designation typically applied to emissions-intensive companies lacking reduction targets, sound climate governance, or a credible decarbonisation strategy.

In addition, our investment products categorised as Article 8 or Article 9 under the SFDR may be subject to our Fossil Fuel Policy which prohibits investments in fossil fuel companies that are not transitioning in line with the climate objectives of the Paris Agreement, while still enabling investments in companies that are leading the transition out of fossil fuels, and hence for which we forecast sufficient reductions in Scope 1,2 and 3 PAI indicators over time. Please refer to the [Fossil Fuel Policy](#) for more information.

Historical comparison

A historical comparison of the period reported on with the previous reported period is included in the section 'Description of principal adverse impacts on sustainability factors' in Tables 1 to 3.