

Sustainability-related disclosures

- *VækstPension Aktiv Medium risk*

Summary

VækstPension Aktiv contributes to the UN Sustainable Development Goals and promotes various environmental and social characteristics, including green transition, circular economy, gender equality and workers' rights.

In practice, this is achieved by investing in companies that help solve environmental and social challenges, by excluding companies and countries open to criticism from the product's investment universe and by attempting to influence companies and asset managers to improve relevant aspects of sustainability.

The financial product promotes environmental or social characteristics, but its objective is not sustainable investment.

Investments are based on Velliv's Responsible Investment and Active Ownership Policy, which is based on international principles and guidelines, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. At the same time, the principal adverse impacts on sustainability factors (PAIs) are taken into consideration when selecting investments as well as in connection with the ongoing monitoring of investments. The principal adverse impacts of investment decisions on sustainability factors are disclosed in annual reports.

In *VækstPension Aktiv* our ambition is to create the best possible risk-adjusted return while taking into account our environmental and social footprint. The strategy ensures investments across a broad range of options, such as listed and unlisted shares, corporate credit, bonds, properties, forestry and infrastructure, balancing return and investment risk in accordance with the product characteristics as a life-cycle product.

The planned proportion of investments that promote environmental and social characteristics is 90%, of which a minimum of 9% will qualify as sustainable investments.

In *VækstPension Aktiv*, investments are primarily made through external asset managers. To ensure that the selection is in line with Velliv's positions and policies in the area, the qualities, methods and processes of the managers are assessed on an ongoing basis.

At Velliv, we continuously monitor whether investments are in line with our Responsible Investment and Active Ownership Policy. If data, analyses or screening show that there is a discrepancy, we will enter into dialogue or exclude the investments.

In order to assess the environmental and social characteristics of the product, ESG data is collected from external data providers. Data is handled internally in recognised and tested systems, and in accordance with the business processes and working procedures applicable to the area.

The extent and quality of available sustainability data vary. This is a natural consequence of the timeframe for the rules intended to ensure available data in this area. At Velliv, we currently have data primarily on listed companies, and to a lesser extent on unlisted investments.

The available data, Velliv's adopted methodologies and the implemented system support allow us to continuously monitor and assess the promotion of environmental and social characteristics as well as the development of the proportion of sustainable investments. Thus, the limitations do not affect the fulfilment of the sustainability characteristics we promise to the customer.