

Sustainability-related disclosures

- *VækstPension Index Low risk*

Summary

VækstPension Index is a lifecycle product with passive management. This means that investments follow selected indices and therefore have a wide spread of investments across countries and sectors.

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. Velliv can only ensure compliance with the exclusion criteria in investments where we have a controlling interest. The principal adverse impacts of investment decisions on sustainability factors are disclosed in annual reports.

The investment strategy in *VækstPension Index* is a passive strategy that aims to create the best possible risk-adjusted return while taking into account our environmental and social footprint. In addition, the investment strategy allows for investment in assets that are expected to provide a high return and other assets with the aim of hedging against risk. *VækstPension Index* thus has the characteristics necessary to balance return and investment risk in a life-cycle product.

The planned proportion of investments that promote environmental and social characteristics is 90%, of which a minimum of 2% will qualify as sustainable investments.

In *VækstPension Index*, 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.