

Statement on principal adverse impacts of investment decisions on sustainability factors

30 June 2023

Financial market participant: Nordea Funds Ltd (529900EJK6EZ8VHYAT71)

Summary

Nordea Funds Ltd (529900EJK6EZ8VHYAT71) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Nordea Funds Ltd¹. Nordea Funds Ltd has delegated the investment management function for the funds managed by it to Nordea Investment Management AB, collectively referred to as “we”, “us” or “our”.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022.

We consider principal adverse impact as part of our investment due diligence process and procedures. At entity level we consider principal adverse impact by measuring and monitoring the aggregated negative impact of our investments on sustainability factors. We consider the mandatory principal adverse impact indicators and two voluntary indicators defined by the Sustainable Finance Disclosure Regulation (SFDR)², subject to data availability and quality. In the absence of mandatory data reporting requirements for investee companies, we are still facing challenges in identifying all principal adverse impact of our investments.

This statement includes the reported principal adverse impact of our investments measured using these indicators. Comparability between the principal adverse impact of our investments and industry benchmarks is challenging due to the diversity of our portfolios (asset class, nature of the instruments, sectors we invest into etc.). Without comparative data from previous reference periods, it is difficult to estimate on which sustainability factors our investments have the most significant negative impact. However, given that climate change is a large threat to the global economy and implies specific risks to the companies and other entities we invest in, reducing the climate impact of our investments is a cornerstone of our ESG (environmental, social and governance) strategy alongside our other core areas of interest – biodiversity loss prevention / water preservation, human rights, and good corporate governance. This is reflected in the priorities set for our engagement activities and commitments. We assess climate change risks and the impact of the low-carbon transition on sectors and companies on an ongoing basis.

This statement also includes a description of actions taken, actions planned, and targets set to seek to reduce and mitigate the principal adverse impact of our investments.

Principal adverse impact assessment is further described in our active ownership and engagement policies and processes. Our active ownership efforts include engagement, proxy voting, attending annual general meetings and contributing to the development of industry ESG standards.

¹ This statement applies as of 30 June 2023. It will be reviewed and updated at least annually. In case of any inconsistency in translations of this statement, the English version will prevail.

² Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.

Förklaring om investeringsbesluts huvudsakliga negativa konsekvenser för hållbarhetsfaktorer

Finansmarknadsaktör: Nordea Funds Ltd (529900EJK6EZ8VHYAT71)

Sammanfattning

Nordea Funds Ltd (529900EJK6EZ8VHYAT71) beaktar sina investeringsbesluts huvudsakliga negativa konsekvenser för hållbarhetsfaktorer. Föreliggande redogörelse är den konsoliderade redogörelsen för huvudsakliga negativa konsekvenser för hållbarhetsfaktorer för Nordea Funds Ltd.³ Nordea Funds Ltd har delegerat investeringsförvaltningsfunktionen för fonderna som man förvaltar till Nordea Investment Management AB, som gemensamt kallas "vi", "oss" eller "vår/våra".

Denna redogörelse om huvudsakliga negativa konsekvenser för hållbarhetsfaktorer omfattar referensperioden från den 1 januari till den 31 december 2022.

Vi beaktar huvudsakliga negativa konsekvenser som en del av våra due diligence-processer och rutiner för investeringar. Vi beaktar huvudsakliga negativa konsekvenser genom att mäta och övervaka de sammantagna negativa konsekvenserna för hållbarhetsfaktorer från våra investeringar. Vi beaktar de obligatoriska indikatorerna för huvudsakliga negativa konsekvenser och två frivilliga indikatorer som definieras av förordningen om hållbarhetsrelaterade upplysningar (SFDR)⁴ utifrån datatillgänglighet och datakvalitet. Då det fortfarande saknas obligatoriska datarapporteringskrav för investeringsobjekten står vi inför utmaningar med att identifiera alla av våra investeringars huvudsakliga negativa konsekvenser.

I denna redogörelse ingår rapporterade huvudsakliga negativa konsekvenser från våra investeringar mätt med hjälp av dessa indikatorer. Det är svårt att jämföra huvudsakliga negativa konsekvenser från våra investeringar med branschjämförelseindex eftersom våra portföljer är mycket diversifierade (tillgångsklass, typ av investeringsinstrument, sektorer vi investerar i osv.). Utan jämförelsedata från tidigare referensperioder är det svårt att uppskatta för vilka hållbarhetsfaktorer som våra investeringar har störst negativa konsekvenser. Klimatförändringarna utgör dock ett allvarligt hot mot den globala ekonomin och medför särskilda risker för de företag och andra enheter som vi investerar i. Därför är minskningen av våra investeringars klimatpåverkan en hörnsten i vår ESG-strategi (miljö, sociala frågor och bolagsstyrning) tillsammans med våra andra centrala intresseområden – förebyggande av förlust av biologisk mångfald/vattenskydd, mänskliga rättigheter och god bolagsstyrning. Detta återspeglas i de prioriteringar som vi fastställer för våra engagemangsaktiviteter och åtaganden. Vi bedömer fortlöpande klimatförändringsrisker och konsekvenserna av omställningen till en ekonomi med låga koldioxidutsläpp för sektorer och företag.

I denna redogörelse ingår även en beskrivning av de åtgärder som vidtas, åtgärder som planeras och de mål vi sätter upp för att minska och begränsa våra investeringars huvudsakliga negativa konsekvenser.

Bedömningen av huvudsakliga negativa konsekvenser beskrivs närmare i våra strategier och processer för engagemang. Vårt arbete med aktivt ägande består i engagemang, fullmaktsröstning, deltagande i bolagsstämmor och att bidra till utvecklingen av branschspecifika ESG-standarder (miljö, sociala frågor och bolagsstyrning).

³ Denna redogörelse gäller per den 30 juni 2023. Den kommer granskas och uppdateras minst en gång per år. I händelse av eventuella inkonsekvenser i översättningen av denna redogörelse ska den engelska versionen gälla.

⁴ Europaparlamentets och rådets förordning (EU) 2019/2088 av den 27 november 2019 om hållbarhetsrelaterade upplysningar som ska lämnas inom den finansiella tjänstesektorn.

Erklæring om viktigste negative effekter av investeringsbeslutninger på bærekraftsfaktorer

Finansmarkedsaktør: Nordea Funds Ltd (529900EJK6EZ8VHYAT71)

Sammendrag

Nordea Funds Ltd (529900EJK6EZ8VHYAT71) vurderer de viktigste negative effektene av dets investeringsbeslutninger på bærekraftsfaktorer. Denne erklæringen er den konsoliderte erklæringen om de viktigste negative effektene på bærekraftsfaktorer for Nordea Funds Ltd.⁵ Nordea Funds Ltd har delegert forvaltningsfunksjonen for fondene det forvalter til Nordea Investment Management AB, som sammen henvises til som "vi", "oss" eller "vår".

Denne erklæringen om det viktigste negative effektene på bærekraftsfaktorer dekker referanseperioden fra 1. januar til 31. desember 2022.

Vi anser de viktigste negative effektene som en del av vår due diligence-prosess og prosedyrer for investeringer. På enhetsnivå vurderer vi de viktigste negative effektene ved å måle og overvåke den samlede negative effekten av våre investeringer på bærekraftsfaktorer. Vi vurderer de obligatoriske indikatorene for viktigste negative effekter og to frivillige indikatorer definert i forordningen om bærekraftsrelaterte opplysninger i finanssektoren (SFDR)⁶, med forbehold om datatilgjengelighet og -kvalitet. I fravær av obligatoriske datarapporteringskrav for investeringsobjekter, har vi fremdeles utfordringer med å identifisere alle de viktigste negative effektene av våre investeringer.

Denne erklæringen omfatter de rapporterte viktigste negative effektene av våre investeringer målt i henhold til disse indikatorene. Det er utfordrende å sammenligne de viktigste negative effektene av våre investeringer med bransjereferanseverdier på grunn av mangfoldigheten til våre porteføljer (aktivaklasse, instrumentenes art, sektorer vi investerer i osv.). Uten sammenlignbare data fra tidligere referanseperioder, er det vanskelig å beregne hvilke bærekraftsfaktorer våre investeringer har den største negative effekten på. Gitt at klimaendringer er en stor trussel mot verdensøkonomien og medfører spesifikke risikoer for selskapene og andre enheter vi investerer i, er reduksjon av klimaeffekter på våre investeringer en hjørnestein i vår ESG-strategi (miljø, samfunnsansvar og eierstyring) sammen med våre andre viktige interesseområder – forhindre tap av biologisk mangfold / konservering av vann, menneskerettigheter og god eierstyring. Dette gjenspeiles av prioriteringene som er satt for våre engasjementsaktiviteter og forpliktelser. Vi vurderer løpende klimaendringsrisikoer og effekten av lavkarbonomstillingen for sektorer og selskaper.

Denne erklæringen inneholder også en beskrivelse av tiltakene som er tatt, tiltak som er planlagt og målene som er satt for å prøve å redusere og dempe de viktigste negative effektene av våre investeringer.

Vurdering av de viktigste negative effektene er beskrevet mer detaljert i våre retningslinjer og prosesser for aktivt eierskap og engasjement. Våre tiltak innen aktivt eierskap omfatter kontakt og engasjement, stemmegivning ved fullmakt, deltakelse på generalforsamlinger og bidrag til utviklingen av ESG-bransjestandarder.

⁵ Denne erklæringen gjelder fra og med 30. juni 2023. Den vil bli gjennomgått og oppdatert minst årlig. Hvis det er uoverensstemmelse i oversettelser av denne erklæringen, er det den engelske versjonen som skal gjelde.

⁶ Europaparlaments- og rådsforordning (EU) 2019/2088 av 27. november 2019 om bærekraftsrelaterte opplysninger i finanstjenestesektoren.

Erklæring om investeringsbeslutningers vigtigste negative indvirkninger på bæredygtighedsfaktorer

Finansiell markedsdeltager: Nordea Funds Ltd (529900EJK6EZ8VHYAT71)

Sammenfatning

Nordea Funds Ltd (529900EJK6EZ8VHYAT71) vurderer de vigtigste negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer. Denne erklæring er den konsoliderede erklæring om vigtigste negative indvirkninger på bæredygtighedsfaktorer fra Nordea Funds Ltd⁷ Nordea Funds Ltd har delegeret investeringsforvaltningsfunktionen for de fonde, som den administrerer, til Nordea Investment Management AB, samlet kaldet "vi", "os" eller "vores".

Denne erklæring om de vigtigste negative indvirkninger på bæredygtighedsfaktorer dækker referenceperioden fra 1. januar til 31. december 2022.

Vi tager hensyn til vigtigste negative indvirkninger som en del af vores due diligence-proces og -procedurer for investering. Vi tager hensyn til de vigtigste negative indvirkninger på enhedsniveau ved at måle og overvåge den samlede negative indvirkning af vores investeringer på bæredygtighedsfaktorer. Vi tager hensyn til de obligatoriske indikatorer for de vigtigste negative indvirkninger samt to frivillige indikatorer, der er defineret i forordningen om oplysninger i sektoren for finansielle tjenesteydelser (Disclosureforordningen)⁸, med forbehold for datatilgængelighed og -kvalitet. På grund af manglende krav om indberetning af obligatoriske data for investeringsmodtagende virksomheder står vi stadig over for udfordringer med henblik på at identificere alle de vigtigste negative indvirkninger af vores investeringer.

Denne erklæring omfatter de indberettede vigtigste negative indvirkninger af vores investeringer målt ved hjælp af disse indikatorer. Sammenlignelighed mellem de vigtigste negative indvirkninger af vores investeringer og branchebenchmarks er udfordrende på grund af spredningen af vores porteføljer (aktivklasse, arten af instrumenter, sektorer vi investerer i, osv.). Uden sammenligningsdata fra tidligere referenceperioder er det svært at skønne, hvilke bæredygtighedsfaktorer vores investeringer har haft den væsentligste negative indvirkning på. Men idet klimaforandringer er en stor trussel for den globale økonomi og medfører specifikke risici for de virksomheder og andre enheder, som vi investerer i, er reducere af vores investeringers klimapåvirkning en hjørnesteen i vores ESG-strategi (miljømæssig, social og ledelsesmæssig) sammen med vores andre centrale interesseområder – forebyggelse af tab af biodiversitet/vandbevarelse, menneskerettigheder og god selskabsledelse. Dette afspejles i prioriteterne fastsat for vores aktiviteter og forpligtelser vedrørende aktivt ejerskab. Vi vurderer løbende klimaforandringens risici og indvirkningen af overgang til lavemissionssamfund på sektorer og virksomheder.

Denne erklæring omfatter også en beskrivelse af trufne tiltag, planlagte tiltag og fastsatte mål for at søge at reducere og afbøde vore investeringers vigtigste negative indvirkninger.

Vurderingen af de vigtigste negative indvirkninger er beskrevet yderligere i vores politikker og processer for aktivt ejerskab. Vores tiltag omkring aktivt ejerskab omfatter involvering, stemmeafgivning pr. fuldmagt, deltagelse på årlige generalforsamlinger og bidrag til udvikling af branchemæssige ESG-standarder.

⁷ Erklæringen gælder pr. 30. juni 2023. Den revideres og opdateres mindst én gang om året. I tilfælde af uoverensstemmelser i oversættelser af erklæringen, gælder den engelske udgave.

⁸ Europa-Parlamentets og Rådets forordning (EU) 2019/2088 af 27. november 2019 om bæredygtighedsrelaterede oplysninger i sektoren for finansielle tjenesteydelser.

Selvitys investointipäätösten pääasiallisista haitallisista vaikutuksista kestävyystekijöihin

Finanssimarkkinatoimija: Nordea Funds Ltd (529900EJK6EZ8VHYAT71)

Tiivistelmä

Nordea Funds Ltd (529900EJK6EZ8VHYAT71) ottaa huomioon sijoituspäätöksensä pääasialliset haitalliset vaikutukset kestävyystekijöihin. Tämä ilmoitus on Nordea Funds Ltd:n yhdistetty ilmoitus pääasiallisista haitallisista vaikutuksista kestävyystekijöihin.⁹ Nordea Funds Ltd on siirtänyt hallinnoimiensa rahastojen sijoitusten hallinnoinnin Nordea Investment Management AB:lle. Näihin voidaan viitata yhteisesti me-pronominin eri taivutusmuodoilla.

Tämä ilmoitus pääasiallisista haitallisista vaikutuksista kestävyystekijöihin kattaa viitekauden, joka alkaa 1 päivänä tammikuuta ja päättyy 31 päivänä joulukuuta 2022.

Otamme pääasialliset haitalliset vaikutukset huomioon osana sijoitusten perusteellista tarkastusta (due diligence) ja sijoitusmenettelyä. Otamme huomioon pääasiallisen kielteisen vaikutuksen yhteisön tasolla mittaamalla ja seuraamalla sijoitustemme yhteenlaskettua negatiivista vaikutusta kestävyystekijöihin. Otamme huomioon pakolliset pääasiallisten haitallisten vaikutusten indikaattorit ja kaksi vapaaehtoista indikaattoria, jotka on määritelty kestävän rahoituksen julkistamisasetuksessa (SFDR)¹⁰ tietojen saatavuuden ja laadun mukaan. Koska sijoituskohteena olevilla yrityksillä ei ole pakollisia vaatimuksia tietojen julkaisemisesta, meillä on edelleen haasteita tunnistaa kaikki sijoitustemme pääasialliset haitalliset vaikutukset.

Tämä ilmoitus sisältää sijoitustemme raportoidut pääasialliset haitalliset vaikutukset mainituilla indikaattoreilla mitattuna. Sijoitustemme ja toimialan vertailuarvon vertailukelpoisuus on haaste, koska salkkumme ovat hyvin moninaisia (omaisuusluokka, sijoitusten luonne, sijoituskohteena olevat toimialat jne.). Ilman vertailutietoja aiemmilta viitekausilta on vaikea arvioida, mihin kestävyystekijöihin sijoituksillamme on merkittävin kielteinen vaikutus. Koska ilmastonmuutos on kuitenkin suuri uhka maailmantaloudelle ja aiheuttaa tiettyjä riskejä yrityksille ja muille yhteisöille, joihin sijoitamme, sijoitustemme ilmastovaikutuksen pienentäminen on ESG-strategiamme (ympäristöön, yhteiskuntaan ja hallintotapaan liittyvän strategiamme) kulmakivi muiden meille keskeisten alueiden (biologisen monimuotoisuuden köyhtymisen ehkäiseminen, vesistöjen suojelu, ihmisoikeudet ja yritysten hyvä hallintotapa) ohella. Tämä näkyy vaikuttamistoimiemme ja sitoumustemme prioriteeteissa. Arvioimme ilmastonmuutokseen liittyvät riskit ja pyrimme jatkuvasti vaikuttamaan toimialojen ja yritysten siirtymiseen vähähiilisyteen.

Tämä ilmoitus sisältää myös kuvauksen toteutetuista toimista, suunnitelluista toimista ja asetetuista tavoitteista, joilla pyritään vähentämään ja lieventämään sijoitustemme pääasiallisia haitallisia vaikutuksia.

Pääasiallisten haitallisten vaikutusten arviointi on kuvattu omistajaohjaus- ja vaikuttamispolitiikoissamme ja prosesseissamme. Aktiivinen omistajaohjauksemme sisältää vaikuttamistoimia, valtakirjaäänestämistä, vuosittaisiin yhtiökokouksiin osallistumista ja toimialan ESG-standardien kehittämistyössä mukana oloa.

⁹ Tämä ilmoitus on voimassa 30. kesäkuuta 2023 alkaen. Se tarkistetaan ja päivitetään vähintään kerran vuodessa. Jos tämän ilmoituksen käännöksissä on epäohdonmukaisuuksia, englanninkielinen versio on ratkaiseva.

¹⁰ Euroopan parlamentin ja neuvoston asetus (EU) 2019/2088, annettu 27 päivänä marraskuuta 2019, kestävyteen liittyvien tietojen antamisesta rahoituspalvelusektorilla.

Description of the principal adverse impacts on sustainability factors

The mandatory indicators defined by the SFDR are set out in Table 1 below. For each of 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.

We have also included the reported the principal adverse impact of our investments, measured using these indicators, for the reference period from 1 January to 31 December 2022.¹¹

We will report this information on an annual basis, subject to data availability and quality. Information on impact compared to previous year will be initially reported by 30 June 2024, and thereafter on an annual basis.

¹¹ 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). The impact has been calculated as the monthly average of impacts from 31 May 2022, but does not include an average data set of January-May 2022 due to adjustments to methodology and data availability. The reported impact does not include impact of certain holdings for which data was not available and could not be obtained on a best effort basis or estimated.

Table 1

Indicators applicable to investments in investee companies

Adverse sustainability indicator	Metric	Impact 2022 [year n]	Impact [year n-1] ¹²	Explanation ¹³	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	4.100.942,77 tCO ₂ e ¹⁴	N/A	N/A	We are a signatory to 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. We have an organisational-wide target to reduce the weighted average carbon intensity (WACI) of our investments; a set of portfolio-specific carbon footprint reduction targets, and a complementary target to ensure that individual companies are engaged to become 1.5°C aligned. We have set 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	1.129.725,32 tCO ₂ e	N/A	N/A	
		Scope 3 GHG emissions	32.844.732,64 tCO ₂ e	N/A	N/A	
		Total GHG emissions ¹⁵	5.230.668,15 tCO ₂ e	N/A	N/A	
	2. Carbon footprint	Carbon footprint	47,0242 tCO ₂ e/million EUR invested	N/A	N/A	
	3. GHG intensity of investee companies	GHG intensity of investee companies	108,9534 tCO ₂ e/million EUR of owned revenue	N/A	N/A	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	3,62% investments in fossil fuels	N/A	N/A	Investment products that have been classified as Article 8 or Article 9 under the SFDR may be subject to our Paris Aligned Fossil Fuel Policy which prohibits investments in fossil fuel companies that

¹² Information on impact compared to previous year will be initially reported by 30 June 2024, and continuously on an annual basis.

¹³ Explanation of difference in impact reported will be published initially by 30 June 2024, and continuously on an annual basis.

¹⁴ tCO₂e means tonnes of carbon dioxide equivalent.

¹⁵ Total Scope 1 + 2 GHG emissions.

	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	63,13% non-renewable energy consumption 65,30% non-renewable energy production	N/A	N/A	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. We consider GHG emissions using an internally developed monitoring system.
	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 ¹⁶	Sector A: 0,43 GWh ¹⁷ /million EUR of revenue Sector B: 1,6994 GWh/million EUR of revenue Sector C: 0,4852 GWh/million EUR of revenue Sector D: 3,1733 GWh/million EUR	N/A	N/A	Issuers identified as outliers on any of the GHG emission indicators or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions as further described below.

¹⁶ 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 H: Transportation and storage

Sector L: Real estate activities

¹⁷ GWh or gigawatt hours, is a unit of energy representing one billion (1 000 000 000) watt hours.

			of revenue			
			Sector E: 0,7946 GWh/million EUR of revenue			
			Sector F: 0,1152 GWh/million EUR of revenue			
			Sector G: 0,3864 GWh/million EUR of revenue			
			Sector H: 1,5191 GWh/million EUR of revenue			
			Sector L: 0,5133 GWh/million EUR of revenue			

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	1,32% with negative impact	N/A	N/A	<p>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.</p> <p>We commit to take potential negative effects on biodiversity into consideration. Where possible, we engage with companies deemed to be outliers on biodiversity.</p> <p>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.</p>
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0,4984 tonnes/million EUR invested	N/A	N/A	<p>We consider emissions to water generated by investee companies using an internally developed monitoring system.</p> <p>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.</p>
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	0,9026 tonnes/million EUR invested	N/A	N/A	<p>We consider the hazardous waste and radioactive waste ratio generated by investee companies using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the indicator or which exhibit high adverse impact across several indicators, may be</p>

						subject to further analysis and potential actions, as further described below.
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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	0,77% involved in violations	N/A	N/A	<p>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.</p> <p>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.</p> <p>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.</p>
	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 Guidelines for Multinational Enterprises	0,14% without policies	N/A	N/A	<p>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.</p> <p>To assess compliance with UN Global Compact principles and OECD Guidelines for Multinational 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.</p>

						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.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	10,6% pay gap	N/A	N/A	<p>We consider the average unadjusted gender pay gap of investee companies, subject to data quality and availability, using an internally developed monitoring system.</p> <p>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.</p>
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	35,09% female directors/ total directors	N/A	N/A	<p>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.</p> <p>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.</p>

	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	N/A	N/A	<p>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.</p> <p>Our holdings are screened on an ongoing basis for exposure to controversial weapons. If such a holding is detected, we conduct further analysis which is presented to the Responsible Investment Committee that decides how to proceed and any actions to take (e.g. engagement or exclusion).</p>
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Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact 2022	Impact [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	245,6835 tCO ₂ e/million EUR of owned GDP	N/A	N/A	We are a signatory to 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. We have an organisational-wide target to reduce the weighted average carbon intensity (WACI) of our investments; a set of portfolio-specific carbon footprint

						<p>reduction targets, and a complementary target to ensure that individual companies are engaged to become 1.5°C aligned.</p> <p>We have set 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.</p> <p>Investment products that have been classified as Article 8 or Article 9 under the SFDR may be subject to our Paris Aligned Fossil Fuel Policy. The Policy 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 who we forecast sufficient reductions in Scope 1,2 and 3 PAI indicators over time.</p> <p>We will work to enhance data coverage and calculation capabilities to enable monitoring of this indicator.</p>
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Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	16. 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 given our investment universe.
Energy efficiency	17. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	Not applicable given our investment universe.

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 2022 (year n)	Impact [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	0,97% exposure to areas of high water stress	N/A	N/A	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.
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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 2022 (year n)	Impact [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	2,11% identified cases on a weighted average basis	N/A	N/A	<p>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.</p> <p>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.</p> <p>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.</p>

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 means 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 indicators of our investments.¹⁸

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
- Biodiversity/water

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. 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.

¹⁸ 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.

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 intrinsically and compared to its 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.¹⁹

The range of possible actions consists of 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.

¹⁹ 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 Funds Ltd.

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 further 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.

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 in order 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.. Another limitation is that the reported impact has been calculated as the monthly average of impacts from 31 May 2022, but does not include data of January-May 2022, due to adjustments to methodology and data availability. We continuously strive to improve data coverage.

Governance in relation to policies

Our 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 our Responsible Investment team.

Nordea Funds Ltd's Responsible Investment Policy is approved by, respectively, the board of directors of Nordea Funds Ltd and the board of the Danish Nordea Invest fund association. The Responsible Investment Policy is updated on an annual basis and was approved in its current form in April 2023.

Our responsible investment, active ownership and engagement framework is updated at least on an annual basis.

Information on our engagement policies is set out below.

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. 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 our Responsible Investment team. These parameters take into account 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. 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 Funds Ltd has adopted an engagement policy under the Shareholder Rights Directive II²⁰. The purpose of the engagement policy is to describe how we ensure effective and sustainable shareholder engagement and protect shareholder's rights.

The Corporate Governance Principles of Nordea Funds Ltd, which provides an overview of Nordea Fund's Engagement Policy focus on increasing transparency and openness in contacts between the company and its shareholders. These principles shall be seen as overall guidelines for corporate governance to be applied on a pragmatic basis as they may, in individual cases, have to be adapted to local laws, practices and regulations. The Corporate Governance Principles are governed by Nordea Funds Ltd and approved by its board. The Corporate Governance Principles are reviewed on an annual basis and were approved in their current form in 2022.

The scope of our engagement activities include 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+, 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.

²⁰ 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).

Norms engagements may be triggered by observed norms breaches through the norms-based screening process, or by high negative impact on PAI indicators.

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. 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 to divest.

For more information, please refer to the [Corporate Governance Principles of Nordea Funds Ltd.](#)

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
 - PAI 1.10.1 UNGC breaches
- OECD Guidelines for Multinational Enterprises
 - PAI 1.10.1 UNGC breaches
 - PAI 1.11.1 UNGC policy
- UN Guiding Principles on Business and Human Rights
 - PAI 1.10.1 UNGC breaches
 - PAI 1.11.1 UNGC policy
- Universal Declaration of Human Rights
 - PAI 1.10.1 UNGC breaches
- Children's Rights and Business Principles
 - PAI 1.10.1 UNGC breaches

- ILO conventions on labour standards
 - PAI 1.10.1 UNGC breaches
- Rio Declaration on Environment and Development
 - PAI 1.10.1 UNGC breaches
- UN Convention on Corruption
 - PAI 1.10.1 UNGC breaches
- Convention on Cluster Munitions
 - PAI 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. To the extent possible, data reported by companies, regulatory authorities and/or non-governmental organisations are prioritised over data from data providers' estimation models. For some indicators where availability of data is poor, we use proxy data provided by third-party data providers to enable assessment.

External data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Paris Agreement

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; a set of portfolio-specific carbon footprint reduction targets, and a complementary target to ensure individual companies are engaged to become 1.5°C aligned. We have specifically set 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 companies, 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](#). Key data sources include Transition Pathway Initiative, CA100+, Science-Based Targets Initiative and CDP.

In addition, our investment products classified as Article 8 or Article 9 under the SFDR may be subject to our Paris Aligned 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 will be made as of 2024.