

PUBLIC RI REPORT

2021 PILOT

Storebrand Asset Management

Generated 2022-08-18

About this report

The PRI Reporting Framework helps to build a common language and industry standard for reporting responsible investment activities. **Public RI Reports** provide accountability and transparency on signatories' responsible investment activities and support dialogue within signatories' organisations, as well as with their clients, beneficiaries and other stakeholders.

This **Public RI Report** is an export of the signatory's responses to the PRI Reporting Framework during the 2021 reporting period. It includes the signatory's responses to mandatory indicators, as well as responses to voluntary indicators that the signatory has agreed to make public.

The information is presented exactly as it was reported. Where an indicator offered a multiple-choice response, all options that were available to select from are included for context. While presenting the information verbatim results in lengthy reports, the approach is informed by signatory feedback that signatories prefer that the PRI does not summarise the information.

Context

In consultation with signatories, between 2018 and 2020 the PRI extensively reviewed the Reporting and Assessment processes and set the ambitious objective of launching in 2021 a completely new investor Reporting Framework, together with a new reporting tool.

We ran the new investor Reporting and Assessment process as a pilot in its first year, and such process included providing additional opportunities for signatories to provide feedback on the Reporting Framework, the online reporting tool and the resulting reports. The feedback from this pilot phase has been, and is continuing to be analysed, in order to identify any improvements that can be included in future reporting cycles.

PRI disclaimer

This document presents information reported directly by signatories in the 2021 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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Senior Leadership Statement (SLS)

Senior leadership statement

Our commitment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S1	CORE	N/A	N/A	PUBLIC	Our commitment	GENERAL

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment?
- What are the main differences between your organisation's approach to responsible investment in its ESG practice and in other practices, across asset classes?

Storebrand asset Management engages in responsible investment in order to secure competitive long term returns for our clients. We regard sustainability as a significant driver of corporate value» Companies that manage current and future environmental and social opportunities and risks will emerge as leaders and are more likely to create a competitive advantage and long-term stakeholder value.

It is only through investing sustainably that we are fully able to identify risks and opportunities arising from environmental, social and governance factors. A sustainable approach to investing is also important if we are to be good long-term stewards of our clients' capital. Integrating sustainability factors into our investment process allows us to make better-informed investment decisions, and provides a more comprehensive view of each individual investment case.

The UN Sustainable Development Goals outlined in Agenda 2030 provide an internationally recognised context for sustainability. The Sustainable Development Goals are highly relevant to international companies in that they outline a common development agenda towards 2030 and highlight key business risks and opportunities. In addition all major areas of sustainable development are addressed; including issues from healthcare and water use to climate, urban development, corruption and gender diversity. Regarding climate change, our ambition of being aligned with the goals of the Paris Agreement provides an important strategic framework for our investments going forward.

Annual overview

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S2	CORE	N/A	N/A	PUBLIC	Annual overview	GENERAL

- o Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. This might involve e.g. outlining your single most important achievement, or describing your general progress, on topics such as the following:
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policy makers
 - o collaborative engagements
 - attainment of responsible investment certifications and/or awards

In 2020 Storebrand Asset Management took significant steps in its responsible investment agenda. Among the most important initiatives were the following

1) Launch of Storebrand Climate Policy and Net Zero commitment: Storebrand has committed to our investment portfolios having netzero GHG emissions by 2050, at the latest. In 2019, Storebrand was one of the founding members of the United Nations-convened Net-Zero Asset Owner Alliance. The members of the Alliance commit to transitioning their investment portfolios consistent with a maximum temperature rise of 1.5°C above pre-industrial temperatures, taking into account the best available scientific knowledge and regularly reporting on progress.

We commit to using the full range of tools that we as investors have at our disposal to induce companies to meet our expectations. These tools are investing in solutions, use of sustainability ratings, divestment and active ownership. This policy will be overseen by the Board of Directors at Storebrand Asset Management. Responsibility for implementation and assessment of climate risk and opportunities lies with portfolio managers and sustainability teams. We will report regularly on climate specific indicators, on a portfolio level, and will explain how we manage the investment- related risks and opportunities associated with these indicators.

- 2) Intensifying engagement on deforestation through the Investors Policy Dialogue on Deforestation (IPDD) initiative: The IPDD initiative started in early 2020 and was formalised in July 2020 in direct response to increasing global rates of deforestation. It does this by engaging on the systematic and sustainable management of critical natural assets (such as forests and other native vegetation) and to ensure respect for human rights. Storebrand was one of the main drivers for establishing the IPDD initiative. The IPDD initiative is a collaborative engagement initiative involving both asset owners and asset managers globally (with investors from equities, debt and forestry assets, investing in both corporate and sovereign issuers), focussed on engaging with government related authorities and associations, as well as other stakeholders. The focus is on those countries with these critically significant assets where deforestation rates are worrying. The first formal country engagement has been with Brazil, with Indonesia added in late 2020 and exploratory discussions occurring on China.
- 3) Mapping of exposure to high emitting sectors and sector targets. In 2020, Storebrand mapped our portfolio exposure to high emitting sectors, set targets for the relevant sectors starting with 2025, and will report on the exposure and progress per sector annually.

- 4) Social engagement on COVID19: In 2020, we decided to join the group of investors in the Investor Alliance for Human Rights to continue our dialogue with H&M for more leverage and also to be able to engage with more companies in this industry. The investor group has engaged with 45 garment and retail companies to make sure that manufacturers are paid for finished goods and goods in production and that core ILO labor standards are respected including the health and safety of workers to protect them from Covid-19 among others.
- 5) Launch of the Climate Lobbying policy: Storebrand will no longer invest in companies that deliberately and systematically work against the goals and targets enshrined in the Paris Agreement.

Next steps

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S3	CORE	N/A	N/A	PUBLIC	Next steps	GENERAL

What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Storebrand Asset Management has established a framework for continual improvement in our sustainable investments with the following targets towards 2025:

- Reduce the carbon footprint in the Storebrand Group's total equities, corporate bond, and real estate investments by at least 32 per cent by 2025 with the base year of 2018. This is in line with the IPCC's 1.5°C scenarios and commitments communicated through Storebrand's climate strategy and the Net Zero Asset Owner Alliance (NZAOA)
- Climate reduction objectives for high emission sectors:: Storebrand will set targets for emissions reductions for high emission sectors during the first half of 2021
- Continue to be an active owner working collaboratively for improvements at portfolio companies, including focus on social issues in the supply chain.

Endorsement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S4	CORE	N/A	N/A	PUBLIC	Endorsement	GENERAL

The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment.

Name	Bård Bringedal
Position	Head of Equities
Organisation's name	Storebrand Asset Management

● [Free text: Up to 2,000 characters (~300 words)]

Organisational Overview (OO)

Organisational information

Categorisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	Signatory category	Multiple, see guidance	PUBLIC	Categorisation	GENERAL
Select the type that best describes your organisation or the services you provide.						
(O) Fund man	agement	(1) T type	This is our only (o	r primary)		
(P) Fund of fu	nds, manager of man	()	Γhis is an addition ondary) type	nal		

Subsidiary information

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries that are also PRI signatories in their own right?



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

List your subsidiaries that are separate PRI signatories.

✓ (A) Signatory name: SKAGEN funds
☑ (B) Signatory name:Cubera Private Equity
 □ (C) Signatory name: □ (D) Signatory name: □ (E) Signatory name: □ (F) Signatory name:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.2	CORE	OO 2.1	N/A	PUBLIC	Subsidiary information	GENERAL

Indicate if you would like to report the responsible investment activities of your subsidiaries that are separate PRI signatories in this submission.

	(1) Responsible investment activities of this subsidiary and PRI signatory will be included in this report submission	(2) Responsible investment activities of this subsidiary and PRI signatory will be included in their own report submission
(A) Signatory name	0	•
(B) Signatory name	0	•

Reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 3	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

Indicate the year-end date for your reporting year.

	Month	Day	Year
Reporting year end date:	December	31	2020

Assets under management

All asset classes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 4.1, OO 4.2	N/A	PUBLIC	All asset classes	GENERAL

What were your total assets under management (AUM) at the end of the indicated reporting year? Provide the amount in USD.

(A) AUM of your organisation, including subsidiaries	US\$ 110,176,000,000.00
(C) AUM subject to execution, advisory, custody, or research advisory only	$ ext{US\$ }0.00$

Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total assets under management at the end of your indicated reporting year.

	Percentage of AUM
(A) Listed equity – internal	10-50%
(B) Listed equity – external	0-10%
(C) Fixed income – internal	10-50%
(D) Fixed income – external	0.0%
(E) Private equity – internal	0.0%
(F) Private equity – external	0-10%
(G) Real estate – internal	0-10%
(H) Real estate – external	0.0%
(I) Infrastructure – internal	0.0%
(J) Infrastructure – external	0.0%
(K) Hedge funds – internal	0.0%
(L) Hedge funds – external	0.0%
(M) Forestry – internal	0.0%
(N) Forestry – external	0.0%
(O) Farmland – internal	0.0%

(P) Farmland – external	0.0%
(Q) Other – internal, please specify: Diverse	0-10%
(R) Other – external, please specify:	0.0%
(S) Off-balance sheet – internal	0.0%
(T) Off-balance sheet – external	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds or investments.

	(1) Listed equity	(3) Private equity
(A) Segregated mandate(s)	0.0%	0.0%
(B) Pooled fund(s) or pooled investment(s)	>75%	>75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 LE	CORE	OO 5, OO 5.1	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your listed equity assets.

	(A) Internal allocation	(C) External allocation – pooled
(1) Passive equity	>75%	0.0%
(2) Active – quantitative	10-50%	0.0%
(3) Active – fundamental	0-10%	>75%
(4) Investment trusts (REITs and similar publicly quoted vehicles)	0.0%	0.0%
(5) Other, please specify:	0.0%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 FI	CORE	OO 5, OO 5.1	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your fixed income assets.

(A) Internal allocation

(1) Passive – SSA	10-50%
(2) Passive – corporate	10-50%
(3) Passive – securitised	0.0%
(4) Active – SSA	10-50%

(5) Active – corporate	10-50%
(6) Active – securitised	0.0%
(7) Private debt	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 PE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your private equity assets.

(C) External allocation – pooled

(1) Venture capital	0.0%	
(2) Growth capital	0-10%	
(3) (Leveraged) buyout	50-75%	
(4) Distressed, turnaround or special situations	0.0%	
(5) Secondaries	10-50%	
(6) Other, please specify:	0.0%	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 RE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your real estate assets.

(A) Internal allocation

(1) Retail	10-50%
(2) Office	50-75%

(3) Industrial	0-10%
(4) Residential	0-10%
(5) Hotel	10-50%
(6) Lodging, leisure and recreation	0.0%
(7) Education	0-10%
(8) Technology/science	0.0%
(9) Healthcare	0-10%
(10) Mixed use	0.0%
(11) Other, please specify:	0.0%

ESG strategies

Listed equity

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6 LE	CORE	OO 5.2 LE	OO 6.1 LE, LE 13	PUBLIC	Listed equity	1

Which ESG incorporation strategy and/or combination of strategies do you apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity:

(A) Screening alone	0.0%
(B) Thematic alone	0.0%
(C) Integration alone	0.0%
(D) Screening and integration	0.0%

(E) Thematic and integration	0.0%
(F) Screening and thematic	0.0%
(G) All three strategies combined	>75%
(H) None	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6.1 LE	CORE	OO 6 LE	LE 8	PUBLIC	Listed equity	1

What type of screening is applied to your internally managed active listed equity assets?

Percentage coverage out of your total listed equities where screening strategy is applied

(A) Positive/best-in-class screening only	0.0%
(B) Negative screening only	0.0%
(C) A combination of positive/best-in-class and negative screening	>75%

Fixed income

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6 FI	CORE	OO 5.2 FI	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation strategy and/or combination of strategies do you apply to your internally managed active fixed income?

	(1) Fixed income – SSA	(2) Fixed income – corporate
(A) Screening alone	>75%	0.0%

(B) Thematic alone	0.0%	0.0%
(C) Integration alone	0.0%	0.0%
(D) Screening and integration	0.0%	0.0%
(E) Thematic and integration	0.0%	0.0%
(F) Screening and thematic	0.0%	0.0%
(G) All three strategies combined	0.0%	>75%
(H) None	0.0%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6.1 FI	CORE	OO 6 FI	N/A	PUBLIC	Fixed income	1

What type of screening is applied to your internally managed active fixed income?

	(1) Fixed income – SSA	(2) Fixed income – corporate
(A) Positive/best-in-class screening only	0.0%	0.0%
(B) Negative screening only	>75%	0.0%
(C) A combination of positive/best-in-class and negative screening	0.0%	>75%

Externally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6 SAM	CORE	OO 5.2 LE, OO 5.2 FI	OO 6.1 SAM	PUBLIC	Externally managed assets	1

Which ESG incorporation strategy and/or combination of strategies apply to your externally managed active listed equity and fixed income?

(1) Listed equity - external (A) Screening alone 0.0%(B) Thematic alone 0.0%(C) Integration alone 0.0%(D) Screening and integration 0.0%(E) Thematic and integration 0.0%0.0%(F) Screening and thematic (G) All three strategies combined >75%0.0%(H) None

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6.1 SAM	CORE	OO 6 SAM	N/A	PUBLIC	Externally managed assets	1

What type of screening is applied to your externally managed active listed equity and fixed income?

(1) Listed equity - external

(A) Positive/best-in-class screening only	0.0%
(B) Negative screening only	0.0%
(C) A combination of positive/best-in-class and negative screening	>75%

Externally managed assets

Captive relationships

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	OO 5	Multiple, see guidance	PUBLIC	Captive relationships	GENERAL

Does your organisation have a captive relationship with some or all of its external investment managers?

 \circ (A) Yes

(B) No

Investment consultants

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	OO 5	SAM 1	PUBLIC	Investment consultants	GENERAL

Does your organisation engage investment consultants in the selection, appointment or monitoring of your external investment managers?

(A) Yes (B) No

Stewardship

Listed equity

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 LE	CORE	OO 5, OO 5.2 LE	Multiple, see guidance	PUBLIC	Listed equity	2

 $Does \ your \ organisation \ conduct \ stewardship \ activities \ for \ your \ listed \ equity \ assets?$

(1) Engagement on listed equity – active	(2) Engagement on listed equity – passive	(3) (Proxy) voting on listed equity – active	(4) (Proxy) voting on listed equity – passive
		Ø	Ø
Ø			Ø
Ø	Ø	Ø	Ø
	on listed equity - active	on listed equity - active on listed equity - passive	on listed equity — active — passive — passive — equity — active — passive — quity — active — passive — quity — active — — — — — — — — — — — — — — — — — — —

Fixed income

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 FI	CORE	OO 5, OO 5.2 FI	Multiple, see guidance	PUBLIC	Fixed income	2

Does your organisation conduct stewardship activities for your fixed income assets?

	(1) Passive – SSA	(2) Passive – corporate	(4) Active – SSA	(5) Active – corporate
(A) Through service providers				
(C) Through internal staff		Ø		Ø
(D) Collaboratively	Z	Ø	V	Ø
(E) We did not conduct this stewardship activity for this strategy/asset type				

Private equity, real estate and infrastructure

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 ALT	CORE	OO 5	Multiple, see guidance	PUBLIC	Private equity, real estate and infrastructure	2

Does your organisation conduct stewardship activities in the following asset classes?

	(1) Private equity	(2) Real estate
(A) Through service providers		
(B) Through external managers		
(C) Through internal staff	Ø	☑

(D) Collaboratively	
(E) We did not conduct stewardship activities for this asset class	

ESG incorporation

Internally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Internally managed assets	1

For each internally managed asset class, select whether or not you incorporate ESG into your investment decisions.

	(1) ESG incorporated into investment decisions	(2) ESG not incorporated into investment decisions
(A) Listed equity – passive	•	0
(B) Listed equity – active – quantitative		0
(C) Listed equity – active – fundamental	•	0
(F) Fixed income – SSA	•	0
(G) Fixed income – corporate	•	0
(K) Real estate	•	0
(W) Other [as specified]	•	0

External manager selection

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager selection	1

For each externally managed asset class, select whether or not you incorporate ESG into external manager selection. Your response should refer to the selection of the external managers who managed the relevant asset classes during the reporting year, regardless of when such selection took place.

	(1) ESG incorporated into external manager selection	(2) ESG not incorporated into external manager selection	
(B) Listed equity – active	•	0	
(E) Private equity	•	0	

External manager appointment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager appointment	1

The following externally managed asset classes are reported in OO 5.1 as 100% pooled funds or pooled investments and, therefore, ESG incorporation into external manager appointment is not applicable.

(3) ESG incorporation into external manager appointment is not applicable as we only invest in pooled funds
•

External manager monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager monitoring	1

For each externally managed asset class, select whether or not you incorporated ESG into external manager monitoring during the reporting year.

	(1) ESG incorporated into external manager monitoring	(2) ESG not incorporated into external manager monitoring
(B) Listed equity – active	•	0
(E) Private equity	•	0

Voluntary reporting

Voluntary modules

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Voluntary modules	GENERAL

The following modules are voluntary to report on in the separate PRI asset class modules as they account for less than 10% of your total AUM and are under USD 10 billion. Please select if you wish to voluntarily report on the module.

	(1) Yes, report on the module	(2) No, opt out of reporting on the module
(G) Real estate	•	0
(J) External manager selection, appointment and monitoring (SAM) – listed equity		0

(L) External manager selection, appointment and monitoring (SAM) – private equity

0

The following modules are mandatory to report on as they account for 10% or more of your total AUM or are over USD 10 billion. The ISP (Investment and Stewardship Policy) module is always applicable for reporting.

(1) Yes, repo	rt on t	the 1	module
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ISP: Investment and Stewardship Policy	
(A) Listed equity	
(B) Fixed income – SSA	
(C) Fixed income – corporate	•

Pooled funds governance: Appointment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 5.1	SAM 12	PUBLIC	Pooled funds governance: Appointment	GENERAL

Would you like to voluntarily report on ESG incorporation in the appointment of your external managers for pooled funds?

(A) Yes

∘ (B) No

ESG/sustainability funds and products

Labelling and marketing

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Labelling and marketing	GENERAL

What percentage of your assets under management in each asset class are ESG/sustainability marketed funds or products, and/or ESG/RI certified or labelled assets? Percentage figures can be rounded to the nearest 5% and should combine internally and externally managed assets.

	Percentage
(A) Listed equity – passive	>75%
(B) Listed equity – active	>75%
(C) Fixed income – passive	>75%
(D) Fixed income – active	>75%
(E) Private equity	>75%
(F) Real estate	>75%
(K) Other	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16.1	CORE	OO 16	ISP 52	PUBLIC	Labelling and marketing	GENERAL

What percentage of your total assets (per asset class) carry a formal ESG/RI certification or label? Percentage figures can be rounded to the nearest 5%.

Coverage of ESG/RI certification or label:

(A) Listed equity	0.0%
(B) Fixed income	0.0%
(C) Private equity	0.0%
(D) Real estate	25-50%

Climate investments

Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17	CORE	N/A	N/A	PUBLIC	Asset breakdown	GENERAL

What percentage of your assets under management is in targeted low-carbon or climate-resilient investments?

25-50%

Other asset breakdowns

${\bf Geographical\ breakdown}$

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

What is the geographical breakdown of your organisation's assets under management by investment destination (i.e. where the investments are located)?

	(1) Listed equity	(2) Fixed income – SSA	(3) Fixed income – corporate	(6) Private equity	(7) Real estate
(A) Developed	>75%	>75%	>75%	>75%	>75%
(B) Emerging	0-25%	0-25%	0-25%	0.0%	0.0%
(C) Frontier	0.0%	0.0%	0.0%	0.0%	0.0%
(D) Other	0.0%	0.0%	0.0%	0.0%	0.0%

Management by PRI signatories

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What approximate percentage (+/-5%) of your externally managed assets are managed by PRI signatories?

> 75%

Fixed income constraints

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 5.2 FI	OO 20.1	PUBLIC	Fixed income constraints	GENERAL

What percentage of your fixed income assets are subject to constraints? The constraints may be regulatory requirements, credit quality restrictions, currency constraints or similar.

Internal and external fixed income assets subject to constraints

(A) Fixed income – SSA	0.0%
(B) Fixed income – corporate	0.0%

Real estate: Building type

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	OO 5	$\begin{array}{c} \mathrm{RE}\ 1,\mathrm{RE}\ 9,\mathrm{RE} \\ 10 \end{array}$	PUBLIC	Real estate: Building type	GENERAL

What is the percentage breakdown of your direct physical real estate assets by strategy?

Percentage total of direct physical real estate AUM

(A) Standing investments	>75%
(B) New construction	0-25%
(C) Major renovation	0.0%

Context and explanation

Appointment: Pooled funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 33	CORE	OO 5.1	N/A	PUBLIC	Appointment: Pooled funds	GENERAL

For your externally managed pooled funds, please describe any other mechanisms in place to set expectations as part of the appointment or commitment process.

ESG in fund manager selection process - Pooled funds

ESG is an integrated part of the Storebrand/SPP manager selection process. The process includes qualitative and quantitative measures and assessments

Quantitative measures include our proprietary ESG rating which covers E, S and G considerations on stock and portfolio level. We also complement internal ratings with data from our external data providers.

The quantitative measures will include considerations of the current and historical portfolio characteristics, but also how well the portfolios are positioned in terms of relevant future sustainability trends.

We also rate our external funds/managers using a wide range of criteria. The main areas in this qualitative assessment are as following: \sqcap The fund mandate with respect to ESG considerations

Attitudes expressed, implemented policies and dedicated ESG resources in the fund organization

☐ Integration of ESG in the investment process

Portfolio manager/team knowledge and attitudes

☐ Previous experience with the manager in question

When monitoring the external managers selected, we also use a combination of quantitative and

qualitative measures. Changes in overall ratings and portfolio content is of course important, as well as ongoing periodical fund reviews with the managers where we discuss portfolio positions from an ESG perspective. Working together with our external managers to influence the portfolio companies in a better direction is also important for us, as this gives increased leverage to our internal impact potential.

ESG in other asset classes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 34	CORE	Multiple, see guidance	N/A	PUBLIC	ESG in other asset classes	1

Describe how you incorporate ESG into the following asset classes.

	Description
(C) Other – internal	$\mathrm{N/A}$

Investment and Stewardship Policy (ISP)

Responsible investment policy & governance

Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1	CORE	N/A	ISP 1.1, ISP 1.2	PUBLIC	Responsible investment policy	1

Does your organisation have a formal policy or policies covering your approach to responsible investment? Your approach to responsible investment may be set out in a standalone guideline, covered in multiple standalone guidelines or be part of a broader investment policy. Your policy may cover various responsible investment elements such as stewardship, ESG guidelines, sustainability outcomes, specific climate-related guidelines, RI governance and similar.

(A) Yes, we do have a policy covering our approach to responsible investment

o (B) No, we do not have a policy covering our approach to responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.1	CORE	ISP 1	Multiple, see guidance	PUBLIC	Responsible investment policy	1

What elements does your responsible investment policy cover? The responsible investment elements may be set out in one or multiple standalone guidelines, or they may be part of a broader investment policy.

- (A) Overall approach to responsible investment
- ☑ (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- ☑ (E) Approach to stewardship
- ☑ (F) Approach to sustainability outcomes
- (G) Approach to exclusions
- □ (H) Asset class-specific guidelines that describe how ESG incorporation is implemented
- ☑ (I) Definition of responsible investment and how it relates to our fiduciary duty
- ☑ (J) Definition of responsible investment and how it relates to our investment objectives
- \square (K) Responsible investment governance structure
- ☑ (L) Internal reporting and verification related to responsible investment
- (M) External reporting related to responsible investment
- ☑ (N) Managing conflicts of interest related to responsible investment
- \square (O) Other responsible investment aspects not listed here, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.2	PLUS	ISP 1	N/A	PUBLIC	Responsible investment policy	1

What mechanisms do you have in place to ensure that your policies are implemented in an aligned and consistent way across the organisation?

The Sustainable Investment policy is approved by the Board of Directors and is discussed by the board annually regarding changes that have occured the previous year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 2	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	6

Indicate which of your responsible investment policy elements are publicly available and provide links.

☑ (A) Overall approach to responsible investment. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/standard/standa$

2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020%2011%2009%20The%20Storebrand%20Group%20Sustainable%20Investment%20Policy.pdf

☑ (B) Guidelines on environmental factors. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/f38b9b81-299e-4384-a709-e44b6a3289dc:acbd5b751ea4506bc13a42ed5ef4096d088c1c19/20201109\%20Storebrand\%20Analysis\%20Criterion\%20-\%20Environmental\%20damage.pdf$

☑ (C) Guidelines on social factors. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/download/517b99b5-59c8-4e21-a112-d3befe7b8d87:1f0b89d28d2e616d1ef9e939d9340d0a2617f180/20200904 Storebrand Analysis Criterion-Human Rights.pdf$

☑ (D) Guidelines on governance factors. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/fcfd8a5b-2857-4931-9a04-$

40 db 89 a 3 f 4e 0: a 61424 a d 41 b a 1 c c 28 f e 2 b f e 9 f 90 b 1 de a 92734 db a / 20190114% 20 Storebrand% 20 Analysis% 20 Criterion% 20-% 20 Corruption. pdf and the first of th

☑ (E) Approach to stewardship. Add link(s):

https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/observation-list

☑ (F) Approach to sustainability outcomes. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020\%2011\%2009\%20The\%20Storebrand\%20Group\%20Sustainable\%20Investment\%20Policy.pdf$

☑ (G) Approach to exclusions. Add link(s):

https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard

☑ (I) Definition of responsible investment and how it relates to our fiduciary duty. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-8fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-8fa2-b0bf-standard/_/attachment/inline/89be61ce-5de9-8fa2-b0bf-standard/_/attachment/standard/_/attachment/standard/$

2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020%2011%2009%20The%20Storebrand%20Group%20Sustainable%20Investment%20Policy.pdf

☑ (J) Definition of responsible investment and how it relates to our investment objectives. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020\%2011\%2009\%20The\%20Storebrand\%20Group\%20Sustainable\%20Investment\%20Policy.pdf$

☑ (K) Responsible investment governance structure. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020\%2011\%2009\%20The\%20Storebrand\%20Group\%20Sustainable\%20Investment\%20Policy.pdf$

☑ (L) Internal reporting and verification related to responsible investment. Add link(s):

https://www.storebrand.no/en/asset-management/sustainable-investments/document-library

☑ (M) External reporting related to responsible investment. Add link(s):

https://www.storebrand.no/en/asset-management/sustainable-investments/document-library

☑ (N) Managing conflicts of interest related to responsible investment. Add link(s):

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/the-storebrand-standard/_/attachment/inline/89be61ce-5de9-4fa2-b0bf-2e86651a23f2:227e1ecc20170fc69188db0ba1c21f72a92816a4/2020\%2011\%2009\%20The\%20Storebrand\%20Group\%20Sustainable\%20Investment\%20Policy.pdf$

☐ (P) Our responsible investment policy elements are not publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 3	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your policy elements on overall approach to responsible investment and/or guidelines on environmental, social and governance factors?

- (A) Overall approach to responsible investment
- o (B) Guidelines on environmental factors
- o (C) Guidelines on social factors
- o (D) Guidelines on governance factors

AUM coverage of all policy elements in total:

> 75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 4	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

Which elements does your exclusion policy include?

- (A) Legally required exclusions (e.g. those required by domestic/international law, bans, treaties or embargoes)
- \square (B) Exclusions based on our organisation's values or beliefs (e.g. regarding weapons, alcohol, to bacco and/or avoiding other particular sectors, products, services or regions)
- ☑ (C) Exclusions based on screening against minimum standards of business practice based on international norms (e.g. OECD guidelines, the UN Human Rights Declaration, Security Council sanctions or the UN Global Compact)

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 6	CORE	N/A	ISP 8	PUBLIC	Governance	1

Do your organisation's board, chief-level staff, investment committee and/or head of department have formal oversight and accountability for responsible investment?

- ☐ (A) Board and/or trustees
- ☑ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
- ☑ (C) Investment committee
- \Box (D) Other chief-level staff, please specify:
- ☑ (E) Head of department, please specify department:
- Head of Equities
- \square (F) None of the above roles have oversight and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 7	CORE	N/A	ISP 8	PUBLIC	Governance	1

In your organisation, which internal or external roles have responsibility for implementing responsible investment?

- \square (A) Board and/or trustees
- ☑ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
- ☑ (C) Investment committee
- \square (D) Other chief-level staff [as specified]
- ☑ (E) Head of department [as specified]
- ☑ (F) Portfolio managers
- \square (G) Investment analysts
- ☑ (H) Dedicated responsible investment staff
- \square (I) Investor relations
- ☐ (J) External managers or service providers
- \square (K) Other role, please specify:
- \square (L) Other role, please specify:
- \square (M) We do not have roles with responsibility for implementing responsible investment.

People and capabilities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8	CORE	ISP 6, ISP 7	ISP 8.1, ISP 8.2	PUBLIC	People and capabilities	General

What formal objectives for responsible investment do the roles in your organisation have?

	(2) Chief- level staff	(3) Investment committee	(5) Head of department [as specified]	(6) Portfolio managers	(8) Dedicated responsible investment staff
(A) Objective for ESG incorporation in investment activities				Ø	Z
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	Ø	Ø	Ø	Ø	Ø

	for contributing to the dation approach	levelopment of the	e organisation's	V		
(2) Chief-level	staff (e.g. Chief Executiv	ve Officer (CEO),	Chief Investmen	roles in	ectives linked to variable on your organisation: or Chief Operating Office	
Which respons	sible investment objective	es are linked to va	riable compensa	tion for roles in	n your organisation?	
ISP 8.2	CORE	ISP 8	N/A	PUBLIC	People and capabilities	General
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
	l objectives for vestment exist for this					
	ective related to vestment [as specified]					
	ective related to vestment [as specified]					
(D) Objective	for ESG performance			V	Ø	Ø
the organisation activities (e.g. findings from	for contributing to on's stewardship through sharing continuous ESG vestment decisions)		Ø	Ø	☑	Ø

(3) Investment committee	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	
(5) Head of department	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	
(D) Objective for ESG performance	
(6) Portfolio managers	
(A) Objective on ESG incorporation in investment activities	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	
(D) Objective for ESG performance	

(8)	Dedicated	responsible	investment	staff
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(A) Objective for ESG incorporation in investment activities	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	
(D) Objective for ESG performance	
(G) We have not linked any RI objectives to variable compensation	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 9	CORE	N/A	N/A	PUBLIC	People and capabilities	General

How frequently does your organisation assess the responsible investment capabilities and training needs among your investment professionals?

- o (A) Quarterly or more frequently
- o (B) Bi-annually
- o (C) Annually
- (D) Less frequently than annually
- o (E) On an ad hoc basis
- \circ (F) We do not have a process for assessing the responsible investment capabilities and training needs among our investment professionals

Strategic asset allocation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10	CORE	N/A	ISP 10.1	PUBLIC	Strategic asset allocation	1

Does your organisation incorporate ESG factors into your strategic asset allocation?

- ☑ (A) We incorporate ESG factors into calculations for expected risks and returns of asset classes
- \square (B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes
- \square (C) No, we do not incorporate ESG considerations into our strategic asset allocation
- \square (D) Not applicable, we do not have a strategic asset allocation process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10.1	CORE	ISP 10	N/A	PUBLIC	Strategic asset allocation	1

For what proportion of assets do you incorporate ESG factors into your strategic asset allocation process?

(A) We incorporate ESG factors into calculations for expected risks and returns of asset classes	(2) for the majority of our assets
(B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes	(2) for the majority of our assets

Stewardship

Stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 11	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship policy	2

What percentage of your assets under management does your stewardship policy cover?

(A) Listed equity	>75 $%$
(B) Fixed income	${>}75\%$
(C) Private equity	${>}75\%$
(D) Real estate	>75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12	CORE	ISP 1.1	ISP 12.1	PUBLIC	Stewardship policy	2

Which elements does your organisation's stewardship policy cover? The policy may be a standalone guideline or part of a wider RI policy.

- ☑ (A) Key stewardship objectives
- (B) Prioritisation approach of ESG factors and their link to engagement issues and targets
- ☑ (C) Prioritisation approach depending on entity (e.g. company or government)
- (D) Specific approach to climate-related risks and opportunities
- ☑ (E) Stewardship tool usage across the organisation, including which, if any, tools are out of scope and when and how different tools are used and by whom (e.g. specialist teams, investment teams, service providers, external investment managers or similar)
- ☑ (F) Stewardship tool usage for specific internal teams (e.g. specialist teams, investment teams or similar)
- ☑ (G) Stewardship tool usage for specific external teams (e.g. service providers, external investment managers or similar)
- ☑ (H) Approach to collaboration on stewardship
- ☑ (I) Escalation strategies
- ☑ (J) Conflicts of interest

☑ (K) Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled

- \square (L) How stewardship efforts and results should be communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (M) None of the above elements are captured in our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12.1	PLUS	ISP 12	N/A	PUBLIC	Stewardship policy	2

Describe any additional details related to your stewardship policy elements or your overall stewardship approach.

Storebrand Asset Management's stewardship policy is descibed in the "Active Ownership", "Use of Voting Rights" sections of our Group Sustainable Investment Policy. The policy is reviewed periodically by the SAM management board (at least annually).

Stewardship policy implementation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 13	CORE	ISP 1.1	N/A	PUBLIC	Stewardship policy implementation	2

How is your stewardship policy primarily applied?

- (A) It requires our organisation to take certain actions
- o (B) It describes default actions that can be overridden (e.g. by investment teams for certain portfolios)
- o (C) It creates permission for taking certain measures that are otherwise exceptional
- o (D) We have not developed a uniform approach to applying our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 14	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship policy implementation	2

How does your organisation ensure that its stewardship policy is implemented by external service providers? Please provide examples of the measures your organisation takes when selecting external providers, when designing engagement mandates and when monitoring the activities of external service providers.

Provide examples below:

(A) Measures taken when selecting external providers:

Storebrand Asset Management only uses external services on proxy voting. Our external provider was chosen after a comprehensive procurement process that emphasised issues such as company coverage, team competancy and alignment between provider's sustainability policy for voting and the Storebrand Sustainable Investments policy

(B) Measures taken when designing engagement mandates for external providers:

Storebrand has been in close dialogue with our external proxy voting provider, to make sure that their "Sustainability policy" for proxy voting recommendations are in line with Storebrand's sustainable investments policy. As we have found the policy to very similar, we use the external policy for automated voting on all "standard" resolutions, but have a manual control on all shareholder resolutions and companies of special interest.

(C) Measures taken to monitor external providers' alignment with our organisation's stewardship policy:

We have the possibility to manually change all recommendations made by our proxy provider, and monitor companies/issues of special interest carefully. We overode the external provider's Sustainability policy on approximately 0,5 % of resolutions we voted on in 2020.

Stewardship objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 15	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship objectives	2

For the majority of assets within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate
(A) Maximise the risk–return profile of individual investments	0	0	O	0
(B) Maximise overall returns across the portfolio	0	0	O	0
(C) Maximise overall value to beneficiaries/clients	0	0	0	0

(D) Contribute to shaping specific sustainability outcomes (i.e. deliver impact)

Stewardship prioritisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 16	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship prioritisation	2

What key criteria does your organisation use to prioritise your engagement targets? For asset classes such as real estate, private equity and infrastructure, you may consider this as key criteria to prioritise actions taken on ESG factors for assets, portfolio companies and/or properties in your portfolio. Select up to 3 options per asset class from the list.

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate
(A) The size of our holdings in the entity or the size of the asset, portfolio company and/or property	Ø	Ø	Ø	Ø
(B) The materiality of ESG factors on financial and/or operational performance	Ø	Ø	Ø	Ø
(C) Specific ESG factors with systemic influence (e.g. climate or human rights)	Ø	 ✓	Ø	Ø
(D) The ESG rating of the entity				
(E) The adequacy of public disclosure on ESG factors/performance	Ø	Ø	Ø	Ø
(F) Specific ESG factors based on input from clients				
(G) Specific ESG factors based on input from beneficiaries				

(H) Other criteria to prioritise engagement targets, please specify:		
(I) We do not prioritise our engagement targets		

${\bf Stewardship\ methods}$

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 17	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship methods	2

Please rank the methods that are most important for your organisation in achieving its stewardship objectives. Ranking options: 1 = most important, 5 = least important.

(A) Internal resources (e.g. stewardship team, investment team, ESG team or staff)	1
$\hbox{(B) External investment managers, third-party operators and/or external property managers (if applicable)}$	5
(C) External paid services or initiatives other than investment managers, third-party operators and/or external property managers (paid beyond a membership fee)	4
(D) Informal or unstructured collaborations with peers	3
(E) Formal collaborative engagements (e.g. PRI-coordinated collaborative engagements, Climate Action 100+, the Initiative Climat International (iCI) or similar)	2

Collaborative stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 18	CORE	Multiple, see guidance	ISP 18.1	PUBLIC	Collaborative stewardship	2

Which of the following best describes your organisation's default position, or the position of the service providers/external managers acting on your behalf, with regards to collaborative stewardship efforts such as collaborative engagements?

- (A) We recognise that stewardship suffers from a collective action problem, and, as a result, we actively prefer collaborative efforts
- o (B) We collaborate when our individual stewardship efforts have been unsuccessful or are likely to be unsuccessful, i.e. as an escalation tool
- o (C) We collaborate in situations where doing so would minimise resource cost to our organisation
- o (D) We do not have a default position but collaborate on a case-by-case basis
- o (E) We generally do not join collaborative stewardship efforts

Escalation strategies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 19	PLUS	Multiple, see guidance	N/A	PUBLIC	Escalation strategies	2

Which of these measures did your organisation, or the service providers/external managers acting on your behalf, use most frequently when escalating initial stewardship approaches that were deemed unsuccessful?

	(1) Listed equity	(2) Fixed income
(A) Collaboratively engaging the entity with other investors		
(B) Filing/co-filing/submitting a shareholder resolution or proposal		
(C) Publicly engaging the entity (e.g. open letter)		
(D) Voting against the re-election of one or more board directors		

(F) Voting against the annual financial report (G) Divesting or implementing an exit strategy (H) We did not use any escalation measures during the reporting year. Please explain why below	(E) Voting against the chair of the board of directors	
exit strategy (H) We did not use any escalation measures during the reporting year.		
measures during the reporting year. \Box		
	measures during the reporting year.	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 20	CORE	Multiple, see guidance	N/A	PUBLIC	Escalation strategies	2

If initial stewardship approaches were deemed unsuccessful, which of the following measures are excluded from the potential escalation actions of your organisation or those of the service providers/external managers acting on your behalf?

	(1) Listed equity	(2) Fixed income
(A) Collaboratively engaging the entity with other investors		
(B) Filing/co-filing/submitting a shareholder resolution or proposal		
(C) Publicly engaging the entity (e.g. open letter)		
(D) Voting against the re-election of one or more board directors		
(E) Voting against the chair of the board of directors		
(F) Voting against the annual financial report		
manciai report		

(G) Divesting or implementing an exit strategy	
(H) We do not have any restrictions on the escalation measures we can use	☑

Alignment and effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 21	PLUS	Multiple, see guidance	N/A	PUBLIC	Alignment and effectiveness	2

Describe how you coordinate stewardship across your organisation to ensure that stewardship progress and results feed into investment decision-making and vice versa.

Storebrand has an Engagement Forum which meets at least on a quarterly basis and supervises, selects and prioritizes all engagement initiatives. It is also a place where active ownership and engagement best practice is discussed. It includes financial analysts, fund managers as well as ESG analysts and the Head of Equities. The forum reports on results to Storebrand Asset Management's board.

Stewardship examples

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 22	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship examples	2

Describe stewardship activities that you participated in during the reporting year that led to desired changes in the entity you interacted with. Include what ESG factor(s) you engaged on and whether your stewardship activities were primarily focused on managing ESG risks and opportunities or delivering sustainability outcomes.

	(1) Engagement type	(2) Primary goal of stewardship activity
(A) Example 1	a) Internally (or service provider) led	c) Both managing ESG risks and delivering outcomes
(B) Example 2	b) Collaborative	c) Both managing ESG risks and delivering outcomes

(C) Example 3	a) Internally (or service provider) led	c) Both managing ESG risks and delivering outcomes	
	(3) The ESG factors you focused on in the stewardship activity	(4) Description of stewardship activity and the desired change(s) you achieved	
(A) Example 1	Environmental: Deforestation and Aquaculture Individual engagement. Proactive	Objective: Engagement with the Norwegian salmon industry to have deforestation free suppliers Storebrand has been engaging with selected Norwegian aquaculture companies through 2019-2020 to ensure that their suppliers are deforestation free. In the end of 2020, the Brazilian soy suppliers to the salmon industry, CJ Selecta, Caramuru and Imcopa, announced that they will implement a 100 percent deforestation and conversion free soybean value chain with 2020 as their cut-off date. (response continued in row below)	
		No soy grown on land deforested after this deadline will be traded. Companies we have been in dialogue with are Grieg, Mowi, Lerøy https://griegseafood.com/news/soy-vendors-to-the-salmon-industry-end-trade-of-deforestation-linked-soy-in-brazil.	

During 2020, Storebrand carried out a human rights' due diligence of its portfolios in connection with the social effect of Covid-19. As a result, we decided to focus part of our active ownership work on supply chain workers in the textile industry since the garment sector is one of the most deeply affected. Storebrand has been engaging with Hennes & Mauritz (H&M) individually for many years. However, in 2020, we Social: Covid-19, Supply Chains and decided to join the group of investors in (B) Example 2 H&M Collaborative engagement. the Investor Alliance for Human Rights Reactive and proactive to continue our dialogue with H&M for more leverage and also to be able to engage with more companies in this industry. The investor group has been engaging with 45 garment and retail companies to make sure that manufacturers are paid for finished goods and goods in production and that core ILO labor standards are respected including the health and safety of workers to protect them from Covid-19 among others. (response continued in row below) For Storebrand, these basic demands have been very important, but our focus has also been on taking this opportunity to effect the creation of resilient supply chains as the final goal. This means that to start with our dialogue has been reactive but our final goal for this engagement has been of a more proactive nature. Thus, although H&M had been accused of not paying for finished orders in Bangladesh and later the company told us it would continue to stand by its commitments and agreements by taking delivery of and pay for already produced

goods as well as goods in production, it was even more important for us to see how the company worked beyond short term solutions. (response continued in

row below)

We were glad to see that the company decided to join the ILO Covid-19 Call to Action to actually work with other stakeholders such as worker unions and governments to enable that the structures of a social protection systems, as well as workers health and employment are addressed coherently in the long-run. By the end of 2020, H&M announced it was part of a group working to finance direct relief to garment workers impacted by the pandemic..

(C) Example 3

Governance: Corruption. Samsung Individual engagement. Reactive

Following a prolonged period of targeted work and active engagement with Samsung Electronics, the company was removed from the Storebrand Group observation list and fully included in the Group's investable universe from Q1 2020. Samsung Electronics was placed on the Group observation list in January 2019 after being fully excluded since 2017. (response continued in row below)

Storebrand and its subsidiary Skagen have been in dialogue with Samsung over a longer period to address various ESG-related issues, including the corruption and bribery case that led to its exclusion.

Following close monitoring and regular engagement, dialogue, and cooperation, we have seen Samsung improve against almost all our predefined criteria to resolve the controversies over the last 24 months. Some of the improvements are: the creation of an independent compliance committee; Samsung now has several independent board members that make up majority of board. (response continued in row below)

Since Q1 2020 the Chair is also an independent for the first time in Samsung's history and the company is implementing a policy that commits the company to make public all information on political donations and/or lobbying costs.

It is for this reason that the company has been removed from the observation list and is now fully included in the Storebrand's investment universe..

Engaging policymakers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23	CORE	N/A	Multiple, see guidance	PUBLIC	Engaging policymakers	2

How does your organisation, or the external investment managers or service providers acting on your behalf, engage with policymakers for a more sustainable financial system?

- ☑ (A) We engage with policymakers directly
- ☑ (B) We provide financial support, are members of and/or are in another way affiliated with third-party organisations, including trade associations and non-profit organisations, that engage with policymakers
- \square (C) We do not engage with policy makers directly or indirectly

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.1	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

What methods do you, or the external investment managers or service providers acting on your behalf, use to engage with policymakers for a more sustainable financial system?

 \square (A) We participate in "sign-on" letters on ESG policy topics. Describe:

In June 2020 Storebrand Asset Management initiated and signed a joint investor letter to the Government of Brazil voicing concerns on deforestation.

We were, and continue to be concerned about the financial impact that deforestation and the violation of the rights of indigenous peoples may have on our clients and investee companies, by potentially increasing reputational, operational and regulatory risks. Considering increasing deforestation rates in Brazil, we are concerned that companies exposed to potential deforestation in their Brazilian operations and supply chains will face increasing difficulty accessing international markets. Brazilian sovereign bonds are also likely to be deemed high risk if deforestation continues.

Storebrand Asset Management intends to continue to invest in Brazil and help show that economic development and protection of the environment need not be mutually exclusive. We therefore urge the government of Brazil to demonstrate clear commitment to eliminating deforestation and protecting the rights of indigenous peoples.

☑ (B) We respond	d to policy cons	ultations on ESC	policy topics.	Describe:
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Storebrand has participated in Finance Norways work and response to the EU Commission's taxonomy for sustainable activities.

- \square (C) We provide technical input on ESG policy change. Describe:
- \square (D) We proactively engage financial regulators on financial regulatory topics regarding ESG integration, stewardship, disclosure or similar. Describe:
- \square (E) We proactively engage regulators and policy makers on other policy topics. Describe:

In addition to initiating a sign on letter (described in oprion a) above) Storebrand led an alliance of concerned investors to lobby the Brazilian Government to assert greater regulatory control over deforestation in Brazil linked to specific commodities such as Soy and Cattle. Storebrand initiated and participated in high level meetings with the Brazilian Givernment in the summer of 2020.

 \square (F) Other methods used to engage with policymakers. Describe:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.2	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

Do you have governance processes in place (e.g. board accountability and oversight, regular monitoring and review of relationships) that ensure your policy activities, including those through third parties, are aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

● (A) Yes, we have governance processes in place to ensure that our policy activities are aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. Describe your governance processes:

The Storebrand Asset Management Board has responsibility for the implementation of this Group Sustainability Policy, and commitment to the 6 principles of the UNPRI Storebrand Asset Management's Investment Control and Analytics (ICA) department is responsible for verifying that management complies with individual mandates as well as internal and external laws and regulations. The exclusion process, is overseen by Storebrand's investment committee. The committee comprises several representatives of the Storebrand Group's senior management team and other executives, who meet quarterly. Oversight for engagement and active ownership activities lies with the Active Ownership Forum including Storebrand Asset Management's CIO, portfolio managers representing different funds and analysts from the Risk and Ownership team.

o (B) No, we do not have these governance processes in place. Please explain why not:

Engaging policymakers – Policies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24	CORE	ISP 23	ISP 24.1	PUBLIC	Engaging policymakers – Policies	2

Do you have policies in place that ensure that your political influence as an organisation is aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

- (A) Yes, we have a policy(ies) in place. Describe your policy(ies):
- (B) No, we do not a policy(ies) in place. Please explain why not:
 Our policy documents explain how Storebrand as an investor will pursue policy objectives and the methods used to do this. However we do not have an explicit policy on engaging policymakers.

Engaging policymakers – Transparency

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 25	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers – Transparency	2

During the reporting year, did your organisation publicly disclose your policy engagement activities or those conducted on your behalf by external investment managers/service providers?

- ☑ (A) We publicly disclosed details of our policy engagement activities. Add link(s):
- https://www.storebrand.no/en/asset-management/sustainable-investments/active-ownership/exerting-influence-through-active-ownership-exerting-influence-through-active-ownership-exerting-influence-through-active-ownership-exerting-influence-through-active-ownership-exerting-influence-through-active-owner-through-a
- \square (B) We publicly disclosed a list of our third-party memberships in or support for trade associations, think-tanks or similar that conduct policy engagement activities with our support or endorsement. Add link(s):
- https://www.storebrand.no/en/sustainability/commitments-and-cooperations
- □ (C) No, we did not publicly disclose our policy engagements activities during the reporting year. Explain why:
- □ (D) Not applicable, we did not conduct policy engagement activities

Climate change

Public support

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 26	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Paris Agreement?

- (A) Yes, we publicly support the Paris Agreement Add link(s) to webpage or other public document/text expressing support for the Paris Agreement:
- https://www.storebrand.no/en/asset-management/sustainable-investments/our-climate-strategy
- o (B) No, we currently do not publicly support the Paris Agreement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 27	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Task Force on Climate-Related Financial Disclosures (TCFD)?

- \odot (A) Yes, we publicly support the TCFD Add link(s) to webpage or other public document/text expressing support for the TCFD:
- https://www.storebrand.no/en/sustainability/commitments-and-cooperations
- (B) No, we currently do not publicly support the TCFD

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 28	CORE	N/A	N/A	PUBLIC	Governance	General

How does the board or the equivalent function exercise oversight over climate-related risks and opportunities?

☑ (A) By establishing internal processes through which the board or the equivalent function are informed about climate-related risks and opportunities. Specify:

At Storebrand, climate governance starts at the top with our CEO and the board. Our climate policy (2020) was approved by the board and it was decided that the executive management has the overarching responsibility for the implementation of the climate policy. The policy is overseen by the Board of Directors at Storebrand Asset Management.

(B) By articulating internal/external roles and responsibilities related to climate. Specify:

The executive management has the overarching responsibility for the implementation of our climate policy. Storebrand climate policy further states that the responsibility for day-to day implementation and assessment of climate risk and opportunities lies with portfolio managers and sustainability teams. We have also established a structure where there is a board-level oversight of the policy. The executive management will report to the board twice annually.

☑ (C) By engaging with beneficiaries to understand how their preferences are evolving with regard to climate change. Specify:

We have committed to strengthen our work by engaging with beneficiaries and clients with information and analytics on net zero investing and climate risk and opportunity. See our climate policy.

☑ (D) By incorporating climate change into investment beliefs and policies. Specify:

We expect companies to address climate change in a manner meaningful to their operations and wish to support their efforts in managing the risks and pursuing opportunities.

Our expectations are directed at all companies in our portfolio including banks financing high-risk climate projects. We will focus on the most substantial greenhouse gas emitters considering emissions across scope 1, 2 and 3, as well as those companies that we believe present the greatest climate-related risk to our portfolios.

☑ (E) By monitoring progress on climate-related metrics and targets. Specify:

Storebrand has committed its investment portfolios having net-zero GHG emissions by 2050, at the latest. In 2019, Storebrand was one of the founding members of the United Nations-convened Net-Zero Asset Owner Alliance and is also member of the Net-Zero Asset Manager Initiative.

We will emphasize emissions reduction in the real economy and report on progress annually, based on intermediate targets we set in Q4 2020. The 2025 target for emission reductions was 32% for equity, corporate bonds and real estate.

We are also reporting on carbon footprint and monitoring progress on carbon emissions (scope 1,2 and where possible 3). Due to lack of data, focus activa classes are equities, corporate bonds and real estate. In addition we are also monitoring progress on % of assets aligned with solution companies/SDGs.

☑ (F) By defining the link between fiduciary duty and climate risks and opportunities. Specify:

Our fiduciary responsibility is to manage our customers portfolios with the best risk- adjusted returns long term. We see sustainability as a long-term force for change in markets, countries and companies. We are convinced that considering ESG factors results in better informed investment decisions and therefore leads to better results for our clients.

Climate risk is now acknowledged as one of the greatest risks facing humanity. This realization is slowly causing a massive shift of capital, away from the highest emitters of fossil fuels towards companies that provides solutions to the climate crisis.

☑ (G) Other measures to exercise oversight, please specify:

No other measures.

☐ (H) The board or the equivalent function does not exercise oversight over climate-related risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 29	CORE	N/A	N/A	PUBLIC	Governance	General

What is the role of management in assessing and managing climate-related risks and opportunities?

(A) Management is responsible for identifying climate-related risks/opportunities and reporting them back to the board or the equivalent function. Specify:

Storebrand has establised a governance structure for our Climate Policy to ensure climate change is part of Group Management's governance duties in the same way as any other issue prioritized at management level. Storebrand Climate policy is overseen by Group Management which reports to the SAM board twice annually.

The day-to-day responsibility for implementation and assessment of climate risk and opportunities lies also with portfolio managers and sustainability teams. They will report regularly to the executive management on climate specific indicators, on a portfolio level, and will explain how the company is managing the investment-related risks and opportunities associated with these indicators.

\square (B) Management implements the agreed-upon risk management measures. Specify:

The management has the overarching responsibility to implement the following measures and targets set for 2025. See below for more details.

(C) Management monitors and reports on climate-related risks and opportunities. Specify:

As a foreseeable financial issue within mainstream investment and planning horizons, climate change is part of SAM Group Management's governance duties in the same way as any other issue prioritized at management level. The following will be reported on to SAM Management Group twice a year, starting from 2021: -Progress on reduced emissions, based on the short-term targets that the company has set. -Progress on investments in capital flows towards low-carbon, climate-resilient and transition companies. -Progress on engagement with sectors with high climate risks and that contribute heavily to climate change

☑ (D) Management ensures adequate resources, including staff, training and budget, are available to assess, implement and monitor climate-related risks/opportunities and measures. Specify:

The portfolio managers and sustainability teams are expected to report on any deviation to the SAM Group Management on the Climate policy and the reasons for the deviation. In this case, they shall set out the measures which are planned to rectify the shortfall and respond to any recommendations made by SAM Group Management.

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- 1 (H, 1	Other roles management	takes on to assess.	and manage	cumate-related	risks/	opportunities	niease specity:
_ ,	,	o their roles management	Carron OII CO appoint	arra marrago	cililiance i cianoca	I IDILD /	opportunition,	produce apooring.

☐ (F) Our management does not have responsibility for assessing and managing climate-related risks and opportunities

Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30	CORE	N/A	Multiple, see guidance	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified within its investment time horizon(s)?

- \square (A) Specific financial risks in different asset classes. Specify:
- ☑ (B) Specific sectors and/or assets that are at risk of being stranded. Specify:

The following sectors have been identified by Storebrand as at risk of being stranded and accordingly, Storebrand has drastically reduced its exposure to these sectors. Coal: Storebrand will accelerate its coal divestment strategy and no longer invest in companies that derive more than 5 % of their revenues from coal. Oil sands: Storebrand will accelerate its oil sands divestment strategy and no longer invest in companies that derive more than 5% of their revenue from oil sands based activities. Storebrand is currently mapping portfolio exposure to high emitting sectors and owned emissions, and setting targets for the relevant sectors. We will report on the exposure and progress per sector annually. We will also work actively with investor groups such as Climate Action 100+ and Net Zero Asset Owner Alliance to ensure necessary decarbonization.

☑ (C) Assets with exposure to direct physical climate risk. Specify:

Assets connected to commodities that drive deforestation are considered by Storebrand to be direct climate risks. Our climate policy for investments states that Storebrand will no longer invest in companies that are involved in severe and/or systematic unsustainable production of palm oil, soy, cattle and timber.

- \square (D) Assets with exposure to indirect physical climate risk. Specify:
- ☑ (E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:

One of the most important goals for Storebrand Asset Management is to increase investment in products that actively contribute to the mitigation of and adaptation to climate change. We will continue to offer climate positive investment products across asset classes and investment styles in order to make these products accessible to all our clients. In addition, we will ensure that the impacts of these products are reported regularly and transparently. Examples of products we will continue to offer, and develop further, are fossil free funds, Green Bond funds, Sustainable Property investments, and equity funds dedicated to investing in climate solutions.

Specifically our sustainability funds target investments in companies that contribute to development of Sustainable Cities. These companies are well placed to play a role both in mitigation and adaptation to climate change.

In addition to these sectors, Storebrand has mapped sector specific exposure to high emission sectors such as aluminium, aviation, cement and chemicals. In the first half of 2021, Storebrand plans to set sector specific targets for these high risk sectors.

☑ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:

Storebrand operates with a solutions company whitelist which consists of companies that significantly contribute to acheiving climate goals, without causing substantial harm to environment or society.

Examples are companies whose key business is centered around investment themes like renewable energy, technologies for sustainable city development, circular economy and recycling, electric public transport, water management, energy efficiency, sustainable materials and technology, responsible consumption and production,

 \square (G) Other climate-related risks and opportunities identified. Specify:

 \square (H) We have not identified specific climate-related risks and opportunities within our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30.1	CORE	ISP 30	N/A	PUBLIC	Strategy	General

For each of the identified climate-related risks and opportunities, indicate within which investment time-horizon they were identified.

	(1) 3–5 months	(2) 6 months to 2 years	(3) 2–4 years	(4) 5–10 years
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]		Ø		
(C) Assets with exposure to direct physical climate risk [as specified]				☑
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]				Ø
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]				Ø
	(5) 11–20 years	(6) 21–3	0 years	(7) >30 years
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]]	
(C) Assets with exposure to direct physical climate risk [as specified]		С]	
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]]	

(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 31	CORE	N/A	N/A	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified beyond its investment time horizon(s)	Which climate-r	elated risks and	opportunities has	vour organisation	identified be	wond its inve	estment time	horizon(s)	?
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- \square (A) Specific financial risks in different asset classes. Specify:
- □ (B) Specific sectors and/or assets that are at risk of being stranded. Specify:
- \square (C) Assets with exposure to direct physical climate risk. Specify:
- \square (D) Assets with exposure to indirect physical climate risk. Specify:
- □ (E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:

- □ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:
- \square (G) Other climate-related risks and opportunities identified, please specify:
- (H) We have not identified specific climate-related risks and opportunities beyond our organisation's investment time horizon

Strategy: Scenario analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33	CORE	N/A	ISP 33.1	PUBLIC	Strategy: Scenario analysis	General

Does your organisation use scenario analysis to assess climate-related investment risks and opportunities? Select the range of scenarios used.

- ☑ (A) An orderly transition to a 2°C or lower scenario
- (B) An abrupt transition consistent with the Inevitable Policy Response
- ☑ (C) A failure to transition, based on a 4°C or higher scenario
- ☑ (D) Other climate scenario, specify:

In order to accurately gauge climate risk and make informed investment decisions, Storebrand will utilize Climate scenarios as an analysis tool. The 2 degrees initiative PACTA transition tool has been used to gauge exposure to sectors with high carbon intensity, in addition to portfolio exposure to renewables.

□ (E) We do not use scenario analysis to assess climate-related investment risks and opportunities

Sustainability outcomes

Set policies on sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 40	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Where is your approach to sustainability outcomes set out? Your policy/guideline may be a standalone document or part of a wider responsible investment policy.

- ☑ (A) Our approach to sustainability outcomes is set out in our responsible investment policy
- (B) Our approach to sustainability outcomes is set out in our exclusion policy
- (C) Our approach to sustainability outcomes is set out in our stewardship policy
- □ (D) Our approach to sustainability outcomes is set out in asset class–specific investment guidelines
- ☑ (E) Our approach to sustainability outcomes is set out in separate guidelines on specific outcomes (e.g. the SDGs, climate or human rights)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 41	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Which global or regionally recognised frameworks do your policies and guidelines on sustainability outcomes refer to?

- (A) The SDG goals and targets
- ☑ (B) The Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights
- \square (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- ☑ (E) Other frameworks, please specify:
- Ten Principles of the United Nations Global Compact.
- ☑ (F) Other frameworks, please specify:
 - EFAMA's (European Fund and Asset Management Association) Code of external governance Norwegian Fund and Asset Management Association on corporate governance (NUES)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 42	PLUS	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

What are the main reasons that your organisation has established policies or guidelines on sustainability outcomes? Select a maximum of three options.

- ☑ (A) Because we understand which potential financial risks and opportunities are likely to exist in (and during the transition to) an SDG-aligned world
- \square (B) Because we see it as a way to identify opportunities, such as through changes to business models, across supply chains and through new and expanded products and services
- \square (C) Because we want to prepare for and respond to legal and regulatory developments, including those that may lead to stranded assets
- □ (D) Because we want to protect our reputation and licence-to-operate (i.e. the trust of beneficiaries, clients and other stakeholders), particularly in the event of negative sustainability outcomes from investments
- □ (E) Because we want to meet institutional commitments on global goals (including those based on client or beneficiaries' preferences), and communicate on progress towards meeting those objectives
- \square (F) Because we consider materiality over longer time horizons to include transition risks, tail risks, financial system risks and similar
- \square (G) Because we want to minimise negative sustainability outcomes and increase positive sustainability outcomes of investments

Identify sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 43	CORE	N/A	Multiple, see guidance	PUBLIC	Identify sustainability outcomes	1

Has your organisation identified the intended and unintended sustainability outcomes from any of its activities?

- o (A) No, we have not identified the sustainability outcomes from our activities
- (B) Yes, we have identified one or more sustainability outcomes from some or all of our activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44	CORE	ISP 43	ISP 44.1	PUBLIC	Identify sustainability outcomes	1

What frameworks/tools did your organisation use to identify the sustainability outcomes from its activities? Indicate the tools or frameworks you have used to identify and map some or all of your sustainability outcomes.

- $\ensuremath{\square}$ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☑ (B) The Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- \square (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other taxonomies (e.g. similar to the EU Taxonomy), please specify:
- \square (G) Other framework/tool, please specify:
- \square (H) Other framework/tool, please specify:
- \square (I) Other framework/tool, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44.1	CORE	ISP 44	N/A	PUBLIC	Identify sustainability outcomes	1

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- \square (A) At the asset level
- \square (B) At the economic activity level
- ☑ (C) At the company level
- \square (D) At the sector level
- ☐ (E) At the country/region level
- \square (F) At the global level
- \square (G) Other level(s), please specify:
- □ (H) We do not track at what level(s) our sustainability outcomes were identified

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 45	CORE	ISP 43	SO 1	PUBLIC	Identify sustainability outcomes	1

How has your organisation determined your most important sustainability outcome objectives?

- ☑ (A) Identifying sustainability outcomes that are closely linked to our core investment activities
- □ (B) Consulting with key clients and/or beneficiaries to align with their priorities
- (C) Assessing the potential severity (e.g. probability and amplitude) of specific negative outcomes over different timeframes
- (D) Focusing on the potential for systemic impacts (e.g. due to high level of interconnectedness with other global challenges)
- \square (E) Evaluating the potential for certain outcome objectives to act as a catalyst/enabler to achieve a broad range of goals (e.g. gender or education)
- ☑ (F) Analysing the input from different stakeholders (e.g. affected communities, civil society or similar)
- (G) Understanding the geographical relevance of specific sustainability outcome objectives
- \square (H) Other method, please specify:
- □ (I) We have not yet determined our most important sustainability outcome objectives

Transparency & Confidence-Building Measures

Information disclosed – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 46	CORE	OO 16	N/A	PUBLIC	$\begin{array}{c} {\rm Information~disclosed-ESG} \\ {\rm assets} \end{array}$	6

For the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets, what information about your ESG approach do you (or the external investment managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☑ (B) Industry-specific and asset class–specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☑ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- (D) A description of our investment process and how ESG is considered
- (E) ESG objectives of individual funds
- \square (F) Information about the ESG benchmark(s) that we use to measure fund performance

- ☑ (G) Our stewardship approach
- (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☑ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- (J) A list of our main investments and holdings
- \square (K) ESG case study/example from existing fund(s)
- \square (L)We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Information disclosed – Passive ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 47	CORE	Multiple, see guidance	N/A	PUBLIC	Information disclosed – Passive ESG assets	6

For the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets that are passive listed equity and/or passive fixed income, how do you communicate changes in their ESG benchmark selection and construction?

- □ (A) We disclose details that would allow external parties to replicate or test the ESG index or benchmark
- ☑ (B) We disclose the main sources of ESG data, broad ESG assumptions and how this is used to develop ESG passive portfolios
- (C) We disclose a full list of all changes to methodologies
- (D) We disclose any changes that we deem significant to the methodology
- \square (E) We do not communicate changes to methodologies for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets that use ESG indices/benchmarks

Client reporting – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 48	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – ESG assets	6

What ESG information is included in your client reporting for the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets?

- ☑ (A) Qualitative analysis, descriptive examples or case studies
- \square (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☑ (C) Progress on our sustainability outcome objectives
- ☑ (D) Stewardship results
- ☑ (E) Information on ESG incidents, where applicable
- ☐ (F) Analysis of ESG contribution to portfolio financial performance
- \square (G) We do not include ESG information in client reporting for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Information disclosed – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 49	CORE	N/A	N/A	PUBLIC	Information disclosed – All assets	6

For the majority of your total assets under management, what information about your ESG approach do you (or the external managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☑ (B) Industry-specific and asset class–specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☑ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- (D) A description of our investment process and how ESG is considered
- ☑ (E) ESG objectives of individual funds
- □ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- (G) Our stewardship approach
- (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☑ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- □ (J) A list of our main investments and holdings
- ☑ (K) ESG case study/example from existing fund(s)
- \square (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our assets under management

Client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 50	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – All assets	6

What ESG information is included in your client reporting for the majority of your assets under management?

- ☑ (A) Qualitative ESG analysis, descriptive examples or case studies
- (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☑ (C) Progress on our sustainability outcome objectives
- ☑ (D) Stewardship results
- ☑ (E) Information on ESG incidents where applicable
- ☐ (F) Analysis of ESG contribution to portfolio financial performance

□ (G) We do not include ESG information in client reporting for the majority of our assets under management

Frequency of client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 51	CORE	Multiple, see guidance	N/A	PUBLIC	Frequency of client reporting – All assets	6

For the majority of each asset class, how frequently do you report ESG-related information to your clients?

(A) Listed equity	(1) Quarterly
(B) Fixed income	(1) Quarterly
(D) Real estate	(1) Quarterly

Confidence-building measures

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 52	CORE	OO 16.1	Multiple, see guidance	PUBLIC	Confidence-building measures	6

What verification has your organisation had regarding the information you have provided in your PRI Transparency Report this year?

- \square (A) We received third-party independent assurance of selected processes and/or data related to our responsible investment processes, which resulted in a formal assurance conclusion
- □ (B) We conducted a third-party readiness review and are making changes to our internal controls/governance or processes to be able to conduct an external assurance next year
- \square (C) The internal audit function team performed an independent audit of selected processes/and or data related to our responsible investment processes reported in this PRI report
- ☑ (D) Our board, CEO, other C-level equivalent and/or investment committee has signed off on our PRI report
- □ (E) Some or all of our funds have been audited as part of the certification process against a sustainable investment/RI label
- \Box (F) We conducted an external ESG audit of our ESG/sustainability marketed funds or products (excluding ESG/RI certified or labelled assets)
- \square (G) We conducted an external ESG audit of our holdings to check that our funds comply with our RI policy (e.g. exclusion list or investee companies in portfolio above certain ESG rating)
- \square (H) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- \square (I) Responses related to our RI practices documented in this report have been internally reviewed before submission to the PRI
- \square (J) None of the above

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 58	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Who has reviewed/verified the entirety of or selected data from your PRI report?

(A) Board and/or trustees	(4) report not reviewed
(B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))	(3) parts of the report
(C) Investment committee	(4) report not reviewed
(D) Other chief-level staff, please specify: Head of Equities	(4) report not reviewed
(E) Head of department, please specify: Head of Sustainable Investments	(3) parts of the report
(F) Compliance/risk management team	(4) report not reviewed
(G) Legal team	(4) report not reviewed
(H) RI/ ESG team	(1) the entire report
(I) Investment teams	(4) report not reviewed

Manager Selection, Appointment and Monitoring (SAM)

Selection

Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	00 11	SAM 2.1	PUBLIC	Responsible investment policy	1, 4

During the reporting year, did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers? (If you did not select any external managers during the reporting year, refer to the last reporting year in which you did select external managers.)

	(1) Yes, only when selecting external managers of ESG/sustainability funds	(2) Yes, when selecting external managers of ESG/sustainability funds and mainstream funds (This option also applies to signatories who may not hold ESG/sustainability funds)	(3) We did not include compliance with our responsible investment policy as a pre-requisite when selecting external managers
(A) Listed equity (active)	0	•	0
(E) Private equity	0	•	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2.1	CORE	SAM 2	N/A	PUBLIC	Responsible investment policy	1,4

In what proportion of cases did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers?

(1)	Listed	equity	(active)

(B) When selecting external managers of ESG/sustainability funds and mainstream funds	(1) in all cases
(5) Private equity	
(B) When selecting external managers of ESG/sustainability funds and mainstream funds	(1) in all cases

Research and screening

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 3	CORE	OO 11	N/A	PUBLIC	Research and screening	1

When selecting external managers, which aspects of their organisation do you, or the investment consultant acting on your behalf, assess against responsible investment criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

	(1) Listed equity (active)	(5) Private equity
(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM

Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 11	N/A	PUBLIC	Investment practices	1

Which responsible investment practices does your organisation, or the investment consultants acting on your behalf, require as part of your external manager selection criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.) As part of the selection criteria, we require that external managers:

	(1) Listed equity (active)	(5) Private equity	
(A) Incorporate material ESG factors in all of their investment analyses and decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM	
(B) Incorporate their own responsible investment policy into their asset allocation decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM	

(C) Have adequate resources and processes to analyse ESG factors	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Incorporate material ESG factors throughout their portfolio construction	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(J) Track the positive and negative sustainability outcomes of their activities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(K) Other, please	NA	NA
specify:	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	PLUS	OO 11	N/A	PUBLIC	Investment practices	1

Does your organisation, or the investment consultants acting on your behalf, expressly assess the following practices regarding derivatives and short positions as part of your manager selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess whether they apply ESG incorporation into derivatives, insurance instruments (such as CDS) and other synthetic exposures or positions	(1) we do not allow this practice
(B) We assess how they apply their exclusion policies to short and derivative exposures	(1) we do not allow this practice
(C) We assess whether their use of leverage is aligned with their responsible investment policy	(1) we do not allow this practice

Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 10	PLUS	OO 11	N/A	PUBLIC	Sustainability outcomes	1

How does your organisation, or the investment consultant acting on your behalf, assess external managers' approaches to their sustainability outcomes as part of your selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess their track records on advancing sustainability outcomes across their assets	(1) for all of our externally managed AUM
(B) We assess whether they have set targets for the sustainability outcomes of their activities or are willing to incorporate our own targets	(1) for all of our externally managed AUM
(C) We assess how they use key levers including asset allocation, engagement and stewardship activities to advance sustainability outcomes	(1) for all of our externally managed AUM

(D) We assess how well they report on their progress on sustainability outcomes across their assets	(1) for all of our externally managed AUM
(E) Other, please specify: NA	(1) for all of our externally managed AUM

Documentation and track record

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 11	CORE	00 11	N/A	PUBLIC	Documentation and track record	1

As part of your selection process, which documents does your organisation, or the investment consultants acting on your behalf, review to gain confidence in external managers' responsible investment practices? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) Standard client reporting, responsible investment reports or impact reports	(1) for all of our externally managed AUM
(B) Responsible investment methodology and its influence on past investment decisions	(1) for all of our externally managed AUM
(C) Historical voting and engagement activities with investees	(1) for all of our externally managed AUM
(D) Historical engagement activities with policymakers	(1) for all of our externally managed AUM
(E) Compliance manuals and portfolios to ensure universal construction rules are applied (e.g. exclusions, thematic, best-in-class definitions and thresholds)	(1) for all of our externally managed AUM
(F) Controversies and incidence reports	(1) for all of our externally managed AUM
(G) Code of conduct or codes of ethics	(1) for all of our externally managed AUM

(H) Other, please specify:

N.

(1) for all of our externally managed AUM

Appointment

Pooled funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 12, OO 5.1, OO 15	N/A	PUBLIC	Pooled funds	4

How did your organisation, or the investment consultants acting on your behalf, include responsible investment requirements for pooled funds in your current contracts with external managers? (Indicate the proportion of your AUM invested in pooled funds to which each of these requirements applies, regardless of when you appointed your different external managers.)

- (A) We amended or instituted side letters or equivalent legal documentation to include responsible investment requirements
- (1) for all of our AUM invested in pooled funds
- (B) We encouraged the external manager to include responsible investment requirements into the investment mandate, the investment management agreement or equivalent legal documentation
- (1) for all of our AUM invested in pooled funds

Monitoring

Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	OO 13	N/A	PUBLIC	Investment practices	1

During the reporting year, which aspects of your external manager's responsible investment practices did you, or your investment consultant acting on your behalf, monitor?

	(1) Listed equity (active)	(5) Private equity
(A) We monitored their alignment with our organisation's responsible investment strategy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored any changes in their responsible investment–related policies, resourcing, oversight and responsibilities or investment processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their use of ESG data, benchmarks, tools and certifications	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored how ESG incorporation affected the fund's financial and ESG performance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	PLUS	OO 13	N/A	PUBLIC	Investment practices	1

Provide an example of a leading practice you adopted as part of your monitoring of your external managers' responsible investment practices in private equity, real estate and/or infrastructure during the reporting year.

Please provide examples below:

Cubera extensively interacts with managers in its network in order to share best practices and provide guidance and advice in developing their responsible investment capabilities. In one particular case, Cubera Private Equity took a major active role in assisting a Nordic private equity manager in developing their responsible investment policy. Such engagement with managers in Cubera's network are one of the tools Cubera makes use of as outlined in its ESG policy, and other similar engagements have taken place in the past. The desired outcome was achieved - namely a "final product" responsible investment policy - and Cubera has continued to interact with the managers in question and monitor the implementation of the policies.

Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 19	PLUS	OO 13	N/A	PUBLIC	Sustainability outcomes	1

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, monitor your external managers' progress on sustainability outcomes?

- (A) We reviewed progress on the sustainability outcomes of their activities
- \square (B) We reviewed how they used asset allocation individually or in partnership with others to make progress on sustainability outcomes
- ☑ (C) We reviewed how they used individual or collaborative investee engagement, including voting, to make progress on sustainability outcomes
- ☑ (D) We reviewed how they used individual or collaborative systemic stewardship, including policy engagement, to make progress on sustainability outcomes
- \square (E) We reviewed how they contributed to public goods (such as research) or public discourse (such as media) or collaborated with other actors to track and communicate progress against global sustainability goals
- \square (F) Other, please specify:
- \square (G) We did not review their progress on sustainability outcomes

Review

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 20	CORE	OO 13	N/A	PUBLIC	Review	1

During the reporting year, how often did your organisation, or the investment consultants acting on your behalf, require your external managers to report to you on their responsible investment practices?

	(1) Listed equity (active)	(5) Private equity
(A) Quarterly or more often	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Annually	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Less than once a year	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

- (E) On an ad hoc basis (e.g. whenever significant changes, incidents or ESGlinked events occur)
- (1) for all of our externally managed AUM
- (1) for all of our externally managed AUM

Verification

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 21	PLUS	OO 13	N/A	PUBLIC	Verification	1

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, verify the information reported by external managers on their responsible investment practices?

	(1) Listed equity (active)	(5) Private equity
(A) We required evidence of internal monitoring or compliance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We required evidence of external monitoring or compliance	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) We required that they had an independent ESG advisory board or committee	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(D) We required verification by an external, independent auditor	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) Other, please specify:		

Engagement and escalation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 22	CORE	OO 13	N/A	PUBLIC	Engagement and escalation	1

Which actions does your organisation, or the investment consultants acting on your behalf, include in its formal escalation process to address concerns raised during monitoring?

	(1) Listed equity (active)	(5) Private equity
(A) We notify the external manager about their placement on a watch list	\square	☑
(B) We engage the external manager's board or investment committee		
(C) We reduce exposure with the external manager until any non-conformances have been rectified	\square	
(D) We terminate the contract with the external manager if failings persist over a (notified) period of time and explain the reasons for the termination	☑	☑
(E) Other, please specify	\square	Ø
(F) Our organisation does not have a formal escalation process to address concerns raised by monitoring		

Please specify for "(E) Other" above.

In cases where there are breaches of Storebrand's exclusion criteria, we will engage with external fund managers and seek to cooperate with them on specific issues and companies. This both encourages the fund manager to engage with the issue/company in question, but also increases our own influence.

Listed Equity (LE)

Pre-investment phase

Materiality analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 10	LE 1.1	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify material ESG factors across listed equities?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) Yes, we have a formal process to identify material ESG factors for all of our assets	•	•	•
(B) Yes, we have a formal process to identify material ESG factors for the majority of our assets	0	0	0
(C) Yes, we have a formal process to identify material ESG factors for a minority of our assets	٥	0	0
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their own discretion	0	0	O
(E) No, we do not have a formal process to identify material ESG factors	٥	٥	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1.1	CORE	LE 1	N/A	PUBLIC	Materiality analysis	1

How does your current investment process incorporate material ESG factors?

	(1) Passive equity	(2) Active - Quantitative	(3) Active - Fundamental
(A) The investment process incorporates material governance factors	Ø	Ø	
(B) The investment process incorporates material environmental and social factors	Ø	Ø	Ø
(C) The investment process incorporates material ESG factors beyond our organisation's typical investment time horizon	☑	Ø	Ø
(D) The investment process incorporates the effect of material ESG factors on revenues and business operations	Ø	Ø	Ø

Long-term ESG trend analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
${ m LE}~2$	CORE	OO 10	N/A	PUBLIC	Long-term ESG trend analysis	1

Do you continuously monitor a list of identified long-term ESG trends related to your listed equity assets?

	(1) Passive equity	$\begin{array}{c} (2) \ \text{Active} - \\ \text{quantitative} \end{array}$	(3) Active – fundamental
(A) We monitor long-term ESG trends for all assets	•	•	•

(B) We monitor long-term ESG trends for the majority of assets	0	0	0
(C) We monitor long-term ESG trends for a minority of assets	0	0	0
(D) We do not continuously monitor long-term ESG trends in our investment process	0	0	0

ESG incorporation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 10	LE 3.1	PUBLIC	ESG incorporation	1

How does your financial modelling and equity valuation process incorporate material ESG risks?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) We incorporate governance- related risks into financial modelling and equity valuations	Ø	Ø	
(B) We incorporate environmental and social risks into financial modelling and equity valuations		Ø	Ø
(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations	☑	 ✓	
(D) ESG risk is incorporated into financial modelling and equity valuations at the discretion of individual investment decision-makers, and we do not track this process			

(E) We do not incorporate ESG risks into our financial modelling and equity valuations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3.1	CORE	LE 3	N/A	PUBLIC	ESG incorporation	1

In what proportion of cases do you incorporate the following material ESG risks into your financial modelling and equity valuation process?

(1) Passive Equity	
(A) We incorporate governance-related risks into financial modelling and equity valuations	(1) in all cases
(B) We incorporate environmental and social risks into financial modelling and equity valuations	(1) in all cases
(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations	(1) in all cases
(2) Active - Quantitative	
(A) We incorporate governance-related risks into financial modelling and equity valuations	(1) in all cases
(B) We incorporate environmental and social risks into financial modelling and equity valuations	(1) in all cases
(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations	(1) in all cases
(3) Active - Fundamental	
(A) We incorporate governance-related risks into financial modelling and equity valuations	(1) in all cases
(B) We incorporate environmental and social risks into financial modelling and equity valuations	(1) in all cases

(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations

(1) in all cases

Assessing ESG performance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 10	LE 4.1	PUBLIC	Assessing ESG performance	1

What information do you incorporate when you assess the ESG performance of companies in your financial modelling and equity valuation process?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) We incorporate information on current performance across a range of ESG metrics	Ø	☑	☑
(B) We incorporate information on historical performance across a range of ESG metrics	Ø	Ø	☑
(C) We incorporate information enabling performance comparison within a selected peer group across a range of ESG metrics	Ø	 ✓	☑
(D) We incorporate information on ESG metrics that may impact or influence future corporate revenues and/or profitability	Ø	Ø	☑
(E) We do not incorporate ESG factors when assessing the ESG performance of companies in our financial modelling or equity valuation			

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4.1	CORE	${ m LE}~4$	N/A	PUBLIC	Assessing ESG performance	1

In what proportion of cases do you incorporate the following information when assessing the ESG performance of companies in your financial modelling and equity valuation process?

(1) Passive equity (A) We incorporate information on current performance across a range of ESG metrics (1) in all cases (B) We incorporate information on historical performance across a range of ESG (1) in all cases metrics (C) We incorporate information enabling performance comparison within a selected (1) in all cases peer group across a range of ESG metrics (D) We incorporate information on ESG metrics that may impact or influence future (1) in all cases corporate revenues and/or profitability (2) Active - quantitative (A) We incorporate information on current performance across a range of ESG metrics (1) in all cases (B) We incorporate information on historical performance across a range of ESG (1) in all cases metrics (C) We incorporate information enabling performance comparison within a selected (1) in all cases peer group across a range of ESG metrics (D) We incorporate information on ESG metrics that may impact or influence future (1) in all cases corporate revenues and/or profitability (3) Active - fundamental (A) We incorporate information on current performance across a range of ESG metrics (1) in all cases

(B) We incorporate information on historical performance across a range of ESG metrics	(1) in all cases
(C) We incorporate information enabling performance comparison within a selected peer group across a range of ESG metrics	(1) in all cases
(D) We incorporate information on ESG metrics that may impact or influence future corporate revenues and/or profitability	(1) in all cases

ESG incorporation in portfolio construction

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 10	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Outline one best practice or innovative example where ESG factors have been incorporated into your equity selection and research process.

Storebrand's Solutions team has identified a number of key ESG factors that are important opportunities and therefore play into equity selection and the research process. One example of these factors is investment in the devlopment of Sustainable Cities. Under the Sustainable Cities factor, three sub-themes have been researched in detail. The criteria that have been evaluated are the themes' contribution to the SDG targets, weight in the EU Taxonomy on Sustainable Finance and investment potential in the research study on sustainable cities from the International Finance Corporation (IFC). The three investment themes of particular interest towards 2030 are green buildings and energy efficiency, low-emission transport and climate-smart water management.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 10	LE 6.1	PUBLIC	ESG incorporation in portfolio construction	1

How do ESG factors influence your portfolio construction?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) The selection of individual assets within our portfolio is influenced by ESG factors		Ø	

Ø		☑
Ø	Ø	☑
Ø		☑

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6.1	CORE	LE 6	N/A	PUBLIC	ESG incorporation in portfolio construction	1

In what proportion of cases did ESG factors influence your portfolio construction?

(1) Passive equity

(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases

(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process	(1) in all cases
(2) Active – quantitative	
(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases
(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process	(1) in all cases
(3) Active – fundamental	
(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases
(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process	(1) in all cases

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 10	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Please provide two examples of how ESG factors have influenced weightings and tilts in either passive or active listed equity.

Provide examples below: Storebrand's index near range of passive funds are subjected to Storebrand's exclusion criteria for Sustainable Investments. The exclusion criteria or "Storebrand standard" is one of the most comprehensive on the market and covers criteria from Human Rights and Corruption to stranded assets such as coal and oil sands and strict product criteria (A) Example 1: such as tobacco and controversial weapons. The Storebrand quant team actively seeks alternative exposure to these assets by seeking alternative industries and sectors that behave on the same way as those excluded. This tilts the funds weightings, though maintains a similiar risk profile/tracking error. Since 1997, Storebrand has utilised an in-house Sustainability Score as an investment support tool. Since inception, we have improved the score incrementally, in line with better ESG data access, and changes in perceptions on the role of sustainability issues in investments. We use the Storebrand Sustainability Score, and other qualitative information, to give portfolio managers a better understanding of portfolio companies' performance on sustainability. In addition, the (B) Example 2: score is used to optimize portfolios towards better performing companies and to calculate an internal fund rating. We calculate the Sustainability Score on over 4500 companies and base it on a 0-100 scale. It is comprised of two main building blocks, ESG risks and SDG opportunities. On the ESG risk side, the score assesses companies' exposure to, and management of, financially material sustainability risks. (response continued in row below)

On the SDG opportunities side, we analyse sustainability data sources, to find companies whose products and services contribute positively to the achievement of financially relevant SDGs. For products and services, we source FTSE Russel Green Revenue data, in addition to internal research, to identify solutions companies. The SDG opportunities section of the score also has a company operations dimension, particularly related to Gender Equality.

Fund Managers at Storebrand Asset Management are able to access the score on a number of levels. Total Score, Risk Score, SDG Score, and scores for underlying themes within these building blocks, are all readily available. The data sources underpinning the scores are external sources from quality controlled data providers, coupled with internal research..

ESG risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 8	CORE	OO 6.1 LE	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- \square (A) We have an independent committee that oversees the screening implementation process, but only for our ESG/sustainability labelled funds that are subject to negative exclusionary screening
- \square (B) We have an independent committee that oversees the screening implementation process for all of our listed equity assets that are subject to negative exclusionary screening
- ☑ (C) We have an independent committee that verifies that we have correctly implemented pre-trade checks in our internal systems to ensure no execution is possible without their pre-clearance
- \square (D) Other, please specify:
 - Storebrand Asset Management conducts daily automated compliance checks on relevant exclusions for all funds. In addition there are pre-trade checks in internal systems. The compliance function has responsibility for this process and breaches are reported to the Storebrand Asset Management board.
- □ (E) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Post-investment phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 10	N/A	PUBLIC	ESG risk management	1

Do your regular reviews incorporate ESG risks?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) Our regular reviews include quantitative information on material ESG risks specific to individual listed equities			
(B) Our regular reviews include aggregated quantitative information on material ESG risks at a fund level	☑	☑	☑
(C) Our regular reviews only highlight fund holdings where ESG ratings have changed			
(D) We do not conduct regular reviews. Risk reviews of ESG factors are conducted at the discretion of the individual fund manager and vary in frequency			
(E) We do not conduct reviews			

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 10	N/A	PUBLIC	ESG risk management	1

Do you regularly identify and incorporate ESG incidents into the investment process for your listed equity assets?

	(1) Passive equity	(2) Active – quantitative	(3) Active – fundamental
(A) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into all of our investment decisions	•	•	•
(B) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into the majority of our investment decisions	0	0	0
(C) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into a minority of our investment decisions	0	O	O
(D) Yes, we have an ad hoc process in place for identifying and incorporating ESG incidents	0	0	0
(E) Other	0	0	0
(F) We currently do not have a process in place for regularly identifying and incorporating ESG incidents into our investment decision-making	0	o	0

Performance monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 10	N/A	PUBLIC	Performance monitoring	1

Provide an example of an ESG factor that your organisation incorporated into your equity valuation or fund construction and describe how that affected the returns of those assets.

	Provide examples below:
(A) Example from your active listed equity:	Storebrand asset Management has a range of fossil free funds where producers and distributors of fossil fuels are excluded from the portfolio. This significantly affects the portfolio construction and has impacts on the returns of the fund. Since inception our fossil free funds have outperformed their reference index as a result of the fossil free exclusions.
(B) Example from your passive listed equity:	Our index near funds utilise a range of ESG factors to achieve highest possible ESG performance while maintaining a tracking error of under 1. One of these factors is Carbon Footprint (using the weighted average model). One of the optimisation steps the index funds take (using MSCI Barra) is to actively seek lower carbon footprint. This reduces the overall carbon footprint of the fund, and only slightly increases the fund's tracking error.

Passive equity

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 10	N/A	PUBLIC	Passive equity	1

What percentage of your total passive listed equity assets utilise an ESG index or benchmark?

0.0%

Reporting/Disclosure

Sharing ESG information with stakeholders

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 13	CORE	OO 6 LE	N/A	PUBLIC	Sharing ESG information with stakeholders	6

How do you ensure that clients and/or beneficiaries understand ESG screens and their implications?

	(1) for all of our listed equity assets subject to ESG screens	(2) for the majority of our listed equity assets subject to ESG screens	(3) for a minority of our listed equity assets subject to ESG screens	(4) for none of our assets subject to ESG screens
(A) We publish a list of ESG screens and share it on a publicly accessible platform such as a website or through fund documentation	•	0	0	0
(B) We publish any changes in ESG screens and share them on a publicly accessible platform such as a website or through fund documentation	•	0	0	0

(C) We outline any implications of ESG screens, such as deviation from a benchmark or impact on sector weightings, to clients and/or beneficiaries

0 0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 14	CORE	OO 10	N/A	PUBLIC	Sharing ESG information with stakeholders	6

What ESG information is covered in your regular reporting to stakeholders such as clients or beneficiaries?

(1) Passive equity	
(A) Our regular stakeholder reporting includes qualitative examples of engagement and/or ESG incorporation	1) In all of our regular stakeholder reporting
(B) Our regular stakeholder reporting includes quantitative ESG engagement data	1) In all of our regular stakeholder reporting
(C) Our regular stakeholder reporting includes quantitative ESG incorporation data	1) In all of our regular stakeholder reporting
(2) Active – quantitative	
(A) Our regular stakeholder reporting includes qualitative examples of engagement and/or ESG incorporation	1) In all of our regular stakeholder reporting
(B) Our regular stakeholder reporting includes quantitative ESG engagement data	1) In all of our regular stakeholder reporting
(C) Our regular stakeholder reporting includes quantitative ESG incorporation data	1) In all of our regular stakeholder reporting
(3) Active – fundamental	
(A) Our regular stakeholder reporting includes qualitative examples of engagement and/or ESG incorporation	1) In all of our regular stakeholder reporting

(B) Our regular stakeholder reporting includes quantitative ESG engagement data	1) In all of our regular stakeholder reporting
(C) Our regular stakeholder reporting includes quantitative ESG incorporation data	1) In all of our regular stakeholder reporting

Stewardship

Voting policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 15	CORE	OO 9 LE	LE 15.1, LE 16	PUBLIC	Voting policy	2

Does your organisation have a publicly available (proxy) voting policy? (The policy may be a standalone policy, part of a stewardship policy or incorporated into a wider RI policy.)

- (A) Yes, we have a publicly available (proxy) voting policy Add link(s):
 https://www.storebrand.no/en/asset-management/sustainable-investments/active-ownership/proxy-voting//attachment/inline/74a16234-f40e-4057-8b72-
 - $945bc3357bd1: a9dde 6f2c2100886181ed 99f23e90f4743162964/Proxy_voting_guide lines.pdf$
- o (B) Yes, we have a (proxy) voting policy, but it is not publicly available
- o (C) No, we do not have a (proxy) voting policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 15.1	CORE	OO 9 LE, LE 15	N/A	PUBLIC	Voting policy	2

What percentage of your listed equity assets does your (proxy) voting policy cover?

(A) Actively managed listed equity covered by our voting policy (12) 100%

(B) Passively managed listed equity covered by our voting policy (12) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 16	CORE	LE 15	N/A	PUBLIC	Voting policy	2

Does your organisation's policy on (proxy) voting cover specific ESG factors?

(A) Our policy includes voting guidelines on specific governance factors Describe:

1. Business and Value Creation

The company's articles of association should clearly describe the business that the company shall operate. The board of directors should define clear objectives, strategies and risk profiles for the company's business activities such that the company creates value for shareholders. The company should have guidelines for how it integrates considerations related to its stakeholders into its value creation. The board of directors should evaluate these objectives, strategies and risk profiles at least yearly.

2. Board of Directors: Composition and Independence

The composition of the board of directors should ensure that the board can attend to the common interests of all shareholders and meets the company's need for expertise, capacity and diversity. Attention should be paid to ensuring that the board can function effectively as a collegiate body. The composition of the board of directors should ensure that it can operate independently of any special interests. The majority of the shareholder-elected members of the board should be independent of the company's executive personnel and material business contacts. At least two of the members of the board elected by shareholders should be independent of the company's main shareholder(s). The board of directors should not include executive personnel. If the board does include executive personnel, the company should provide an explanation for this and implement consequential adjustments to the organisation of the work of the board, including the use of board committees to help ensure more independent preparation of matters for discussion by the board.

3. Nomination Committee

The company should have a nomination committee, and the nomination committee should be laid down in the company's articles of association. The general meeting should stipulate guidelines for the duties of the nomination committee, elect the chairperson and members of the nomination committee, and determine the committee's remuneration. The nomination committee should have contact with shareholders, the board of directors and the company's executive personnel as part of its work on proposing candidates for election to the board. The members of the nomination committee should be selected to take into account the interests of shareholders in general. The majority of the committee should be independent of the board of directors and the executive personnel.

4. Remuneration

- The remuneration of the board of directors should reflect the board's responsibility, expertise, time
- commitment and the complexity of the company's activities. The remuneration of the board of
- directors should not be linked to the company's performance. Members of the board of directors
- and/or companies with which they are associated should not take on specific assignments for the
- company in addition to their appointment as a member of the board. The board of directors is required
- by law to prepare guidelines for the remuneration of the executive personnel. These guidelines are

communicated to the annual general meeting. The board of director's statement on the remuneration of executive personnel should be a separate appendix to the agenda for the general meeting. It should also be clear which aspects of the guidelines are advisory and which, if any, are binding. The general meeting should vote separately on each of these aspects of the guidelines. The guidelines for the remuneration of the executive personnel should set out the main principles applied in determining the salary and other remuneration of the executive personnel. The guidelines should help to ensure convergence of the financial interests of the executive personnel and the shareholders. Performancerelated remuneration of the executive personnel in the form of share options, bonus programmes or the like should be linked to value creation for shareholders or the company's earnings performance over time. 5. Capital Expenditure-Equity and Dividends The board of directors should ensure that the company has a capital structure that is appropriate to the company's objective, strategy and risk profile. The board of directors should establish and disclose a clear and predictable dividend policy. The background to any proposal for the board of directors to be given a mandate to approve the distribution of dividends should be explained. Mandates granted to the board of directors to increase the company's share capital or to purchase own shares should be intended for a defined purpose. Such mandates should be limited in time to no later than the date of the next annual general meeting. 6. Capital Expenditure-Equal treatment of Shareholders and Transactions with Close Associates Any decision to waive the pre-emption rights of existing shareholders to subscribe for shares in the event of an increase in share capital should be justified. Where the board of directors resolves to carry out an increase in share capital and waive the pre-emption rights of existing shareholders on the basis of a mandate granted to the board, the justification should be publicly disclosed in a stock exchange announcement issued in connection with the increase in share capital. Any transactions the company

carries out in its own shares should be carried out either through the stock exchange or at prevailing
stock exchange prices if carried out in any other way. If there is limited liquidity in the company's
shares, the company should consider other ways to ensure equal treatment of all shareholders.
7. General meetings-Adequate Information Ahead of General Meetings
The board of directors should ensure that the company's shareholders can participate in the general
meeting. The board of directors should ensure that the resolutions and supporting information
distributed are sufficiently detailed, comprehensive and specific to allow shareholders to form a view
on all matters to be considered at the meeting.
8. Take-overs
The board of directors should establish guiding principles for how it will act in the event of a take-over
bid. In a bid situation, the company's board of directors and management have an independent
responsibility to help ensure that shareholders are treated equally, and that the company's business
activities are not disrupted unnecessarily. The board has a particular responsibility to ensure that
shareholders are given sufficient information and time to form a view of the offer. The board of
directors should not hinder or obstruct take-over bids for the company's activities or shares.
Agreements entered into between the company and the bidder that are material to the market's
evaluation of the bid should be publicly disclosed no later than at the same time as the announcement
that the bid will be made is published. Any transaction that is in effect a disposal of the company's
activities, should be decided by a general meeting.
Corruption and Economic Crime
Corruption is a form of financial crime and is defined as the misuse of a trusted position by giving/offering or receiving/accepting improper advantages. Corruption includes trading in influence, money laundering and attempts to conceal or prevent the investigation of such activities and includes activities in the public as well as private sector. Examples of other forms of financial crime are as follows; tax evasion, accounting fraud, embezzlement, insider trading and breaches of competition laws. Therefore, Storebrand expects companies to implement policies and management systems in alignment with; The UN Convention against Corruption, the Council of Europe

Combating Bribery of Foreign Public Officials, The OECD Guidelines for Multinational Enterprises and Principle 10 of the UN Global Compact.

Criminal Law Convention on corruption, The OECD Convention on

	Thus, Storebrand will tend to vote for shareholder proposals that:
	Seek reporting or disclosure on company anti-bribery and anti-corruption practices especially in countries with weak implementation of anti-corruption laws or weak anti-corruption laws.
	Request the adoption and implementation of policies and systems to fight bribery and corruption
	Request extractive industries' companies financial transparency on tax and country-by-country reporting including disaggregated data on a project-by-project basis, contract transparency and disclosure of audited information about the minerals they extract.
	☐ Seek adoption and implementation of policies related to the sourcing of minerals from conflict zones.
	The list of themes above are indicative of the type of resolutions Storebrand will tend to vote on. However, the list should not be considered exhaustive.
	Furthermore, other factors such as the responsiveness of the company to the actual issues presented, the reasonableness of the proposal, the potential cost and benefits of implementing the proposal and shareholder benefit will also be taken into consideration. Storebrand reviews resolutions on a case-by-case basis.
7	(B) Our policy includes voting guidelines on specific environmental factors Describe: 1. The Environment
	Storebrand shall not invest in companies that contribute to or cause serious environmental
	damage. In general, environmental damage involves the act of discharging substances or
	energy into the environment (water, air, soil) in such quantities or concentrations that it inflicts
	damage to the environment, or to plant or animal life, or that it is detrimental to the health or
	well-being of humans. It can also result in biodiversity loss and damage to natural resources.
	The most serious cases can have irreversible effects.
	Therefore, Storebrand/SPP expects companies to implement environmental policies and
	environmental management systems in alignment with main international environmental
	conventions and guidelines such as; The Rio Declaration on Environment and Development;
	The Basel convention on hazardous Wastes and Their Disposal; The Convention on Biological
	Diversity or The Convention on Wetlands of International Importance. For a more exhaustive
	description, see Storebrand's Environmental standard and Policy on Deforestation.
	In addition, two important principles guide assessments:
ī	1) "The Precautionary Principle", which dictates that a lack of complete scientific certainty or

	proof should not be used as a reason to postpone implementing cost-effective measures to
	prevent environmental damage.
	2) "The Polluter Pays Principle", which dictates that the party responsible for causing
	environmental damage should also pay to reduce or reverse it.
	Considering all of the above, Storebrand will tend to vote for shareholder proposals that:
	$\hfill\square$ Seek reporting or disclosure on company environmental practices, environmental
	impact or environmental risks
ĺ	☐ Require to enforce the 'polluter pays' principle
	☐ Require to enforce the 'the precautionary' principle
	☐ Require measures to stop and or prevent negative impact on protected areas that fall
	under categories I-IV (IUCN), UNESCO World Heritage sites, or Ramsar Convention on
	wetlands
	\square Request that extractive industries companies refrain from operating in sites where the
	environmental consequences of an accident are unmanageable.
	$\hfill \square$ Request that extractive industries companies create and enforce effective contingency
	plans for emergency situations.
	$\hfill \square$ Request that companies adopt and implement policies to assess and reduce water risk
	link to company operations and its suppliers especially for those in water-stressed
	areas.
	$\hfill\square$ Request companies to adopt all High Conservation Values (HCV) categories (biological,
	ecological, social and cultural)
	$\hfill \square$ Seek integration of environmental requirements in their procurement and operational
	policies
r	☐ Seek to include clauses on environmental requirements in their contracts with

subcontractors and suppliers
☐ Request that the company considers specific certifications for commodities such as
MSC, FSC, RSPO, RTRS or Five freedoms of animals in its own operations and as
requirement to suppliers.
Climate Change:
In addition, Storebrand/SPP acknowledges climate change as one of the most challenging
sustainability issues ever faced by humankind. Accordingly, Storebrand is a signatory of the
Montréal Pledge, is part of the Portfolio Decarbonisation Coalition and the Institutional
Investors Group on Climate Change (IICGC). It is committed to gradually decarbonise its
portfolios as a way to meet the goals set by the 2015 Paris Agreement and it aims to Net-Zero
GHG portfolios by 2050. Thus, Storebrand/SPP proxy voting implementation will also have a
special focus on all climate change shareholder resolutions and expect companies to work
towards the goals set by the Paris Agreement.
☐ Request reporting or disclosure on risk and opportunities linked to climate change
Request the adoption and implementation of policies to prevent climate change, which may include concrete targets to reduce direct or indirect greenhouse gas emissions (GHG) and energy consumption in order to achieve the Paris Agreement goals.
$\centering \centering \centerin$
$\centering \centering \centerin$
Request the adoption of policies or measures to prevent deforestation and protect natural forest as described in the High Conservation Value (HCV) categories.
☐ Request that companies report according to the Recommendations of the Task force on Climate-related Financial Disclosures (TCFD)
Request increased allocation in more climate friendly investments such as renewables or solution stocks rather than on high-cost, high carbon fossil fuel projects with a stranded asset risk.
\square Request that the board or a member of the board is responsible for climate change strategies implementation and or sustainability in general
☐ Request that suppliers adopt and implement climate change preventive policies

	Request that financial companies report on climate change risk linked to their financial activities and more specifically on efforts to decarbonize portfolios.
	☐ Oppose corporate lobbying intended to prevent regulation addressing climate change
	The list of themes above are indicative of the type of resolutions Storebrand will tend to vote on. However, the list should not be considered exhaustive.
√	(C) Our policy includes voting guidelines on specific social factors Describe: 2. Human Rights and Humanitarian Law
	Storebrand shall not invest in companies that are directly or indirectly involved in severe violations of human rights and/or humanitarian law or other international norms. Corporations have the greatest degree of control, and subsequently responsibility, within their own operations. However, corporate responsibility does not stop at the company's employee level, but also includes members of communities that are affected by the company's operations.
	Therefore, Storebrand expects companies to implement policies and management systems in alignment with main international human rights conventions and guidelines such as: all ILO core conventions including ILO 169 on Indigenous and Tribal people. In addition to, the UN Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights; The UN Convention on the Rights of the Child; the UN Convention to Eliminate All Forms of Discrimination Against Women; the UN Guiding Principles on Business and Human Rights; the UN Charter; the Voluntary Principles on Security and Human Rights among others. For a more exhaustive description see Storebrand human rights standard and humanitarian law standards.
	Considering all of the above, Storebrand will tend to vote for shareholder proposals that:
	\square Seek reporting or disclosure on company social practices, social impact or social risks, including alignment with UN Guiding Principles for Business and Human Rights (UNGP)
	Request adoption and or implementation of labour and human rights standards in alignment with core ILO conventions, main UN human rights conventions, UN Global Compact and OECD and/or IFC Guidelines
	Seek disclosure of processes and implementation of labour standards protecting employees working conditions, benefits, freedom of association and/or wages at the company's core operations and its suppliers as well as ensuring that the company and its suppliers do not use child labour and/or forced labour.
	☐ Call for disclosure on processes to reduce gender inequalities including policies and targets.
	☐ Call for the adoption of a living wage for the company's employees and its suppliers.
	Request disclosure of processes, impact assessments and implementation of policies respecting the rights of communities, especially during the acquisition of land such as adequate compensation, proper resettlement and/or guarantying access to water and other resources for displaced communities, the respect of indigenous peoples and their cultures and the proper application of Free Prior Informed Consent (FPIC).
	☐ Request adoption and or implementation of standards in alignment with international humanitarian law, norms and guidelines such as: the UN Charter, Geneva and Hague conventions, UN Security Council Resolutions, the Voluntary Principles on Security and Human Rights, OECD Guidelines for multinationals in "weak governance" zones and/or UNGP & PRI Guidance on Responsible Business in conflict-affected and high-risk areas.
	☐ Seek disclosure of risk assessment and risk management for operations or sales to conflict zones, fragile states, and authoritarian regimes.

\square Seek adoption and implementation of policies related to the sourcing of minerals from conflict zones.
☐ Seek reporting on foreign military sales or offset agreements
☐ Request to report on policies and implementation of systems to guarantee product safety
\square Request disclosure of company policies and procedures relating to data security, privacy, freedom of speech, information access and management, and Internet censorship
The list of themes above are indicative of the type of resolutions Storebrand will tend to vote on. However, the list should not be considered exhaustive.

\Box (D) Our policy is high-level and does not cover specific ESG factors Describe:

Alignment & effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 17	CORE	OO 9 LE	N/A	PUBLIC	Alignment & effectiveness	2

When you use external service providers to give voting recommendations, how do you ensure that those recommendations are consistent with your organisation's (proxy) voting policy?

constitute with jour organizations (proxy) voting poncy.	
(A) We review service providers' controversial and high-profile voting recommendations before voting is executed	(1) in all cases
(B) Before voting is executed, we review service providers' voting recommendations where the application of our voting policy is unclear	(1) in all cases

Security lending policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18	CORE	OO 9 LE	LE 18.1, LE 18.2	PUBLIC	Security lending policy	2

Does your organisation have a public policy that states how voting is addressed in your securities lending programme? (The policy may be a standalone guideline or part of a wider RI or stewardship policy.)

- (A) We have a public policy to address voting in our securities lending programme. Add link(s):

 https://www.storebrand.no/en/asset-management/sustainable-investments/document-library/_/attachment/inline/c10c4ab6-b87b-4b20-bc4f-35cadc1fceed:26d810d6642be32583f0b126a8fd1e123b756fa9/20210309 Storebrand Sustainable Investment Policy.pdf
- (B) We have a policy to address voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our service provider(s)
- o (D) We do not have a policy to address voting in our securities lending programme
- o (E) Not applicable, we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18.1	CORE	LE 18	N/A	PUBLIC	Security lending policy	2

How is voting addressed in your securities lending programme?

- (A) We recall all securities for voting on all ballot items
- o (B) We always recall all holdings in a company for voting on ballot items deemed important (e.g. in line with specific criteria)
- o (C) We always recall some securities so that we can vote on their ballot items (e.g. in line with specific criteria)
- o (D) We maintain some holdings so that we can vote at any time
- o (E) We recall some securities on an ad hoc basis so that we can vote on their ballot items
- o (F) We empower our securities lending agent to decide when to recall securities for voting purposes
- o (G) Other, please specify:
- \circ (H) We do not recall our securities for voting purposes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18.2	CORE	LE 18	N/A	PUBLIC	Security lending policy	2

What exclusions do you apply to your organisation's securities lending programme?

- \square (A) We do not lend out shares of companies that we are engaging with either individually or as a lead or support investor in collaborative engagements
- \square (B) We do not lend out shares of companies if we own more than a certain percentage of them
- □ (C) We do not lend out shares of companies in jurisdictions that do not ban naked short selling
- \square (D) We never lend out all our shares of a company to ensure that we always keep voting rights in-house
- \square (E) Other, please specify:
- (F) We do not exclude any particular companies from our securities lending programme

Shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 19	CORE	OO 9 LE	N/A	PUBLIC	Shareholder resolutions	2

Which of the following best describes your decision-making approach regarding shareholder resolutions, or that of your service provider(s) if decision-making is delegated to them?

- ♠ (A) In the majority of cases, we support resolutions that, if passed, are expected to advance progress on the underlying ESG factors or on our stewardship priorities
- \circ (B) In the majority of cases, we support resolutions that, if passed, are expected to advance progress on the underlying ESG factors but only if the investee company has not already committed publicly to the action requested in the proposal
- (C) In the majority of cases, we only support shareholder resolutions as an escalation tactic when other avenues for engagement with the investee company have not achieved sufficient progress
- (D) In the majority of cases, we support the recommendations of investee company management by default
- o (E) In the majority of cases, we do not vote on shareholder resolutions

Pre-declaration of votes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 20	CORE	OO 9 LE	N/A	PUBLIC	Pre-declaration of votes	2

How did your organisation or your service provider(s) pre-declare votes prior to AGMs/EGMs?

- \square (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system
- □ (B) We pre-declared our voting intentions publicly (e.g. through our own website) Link to public disclosure:
- \square (C) We pre-declared our voting intentions publicly through the PRI's vote declaration system, including the rationale for our (proxy) voting decisions where we planned to vote against management proposals or abstain
- □ (D) We pre-declared our voting intentions publicly, including the rationale for our (proxy) voting decisions where we planned to vote against management proposals or abstain Link to public disclosure:
- \square (E) Prior to the AGM/EGM, we privately communicated our voting decision to investee companies in cases where we planned to vote against management proposals or abstain
- (F) We did not privately or publicly communicate our voting intentions
- □ (G) We did not cast any (proxy) votes during the reporting year

Voting disclosure post AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 21	CORE	OO 9 LE	LE 21.1	PUBLIC	Voting disclosure post AGM/EGM	2

Do you publicly report your (proxy) voting decisions, or those made on your behalf by your service provider(s), in a central source?

- (A) Yes, for >95% of (proxy) votes Link:
 https://vds.issgovernance.com/vds/#/MTAzNiM=/
- o (B) Yes, for the majority of (proxy) votes Link:
- \circ (C) Yes, for a minority of (proxy) votes 1) Add link and 2) Explain why you only publicly disclose a minority of (proxy) voting decisions:
- \circ (D) No, we do not publicly report our (proxy) voting decisions Explain why you do not publicly report your (proxy) voting decisions:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 21.1	CORE	LE 21	N/A	PUBLIC	Voting disclosure post AGM/EGM	2

In the majority of cases, how soon after an investee's AGM/EGM do you publish your voting decisions?

- o (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- o (C) Within six months of the AGM/EGM
- o (D) Within one year of the AGM/EGM
- o (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 22	CORE	OO 9 LE	LE 22.1	PUBLIC	Voting disclosure post AGM/EGM	2

Did your organisation and/or the service provider(s) acting on your behalf communicate the rationale for your voting decisions?

- \square (A) In cases where we voted against management recommendations or abstained, the rationale was provided privately to the company
- (B) In cases where we voted against management recommendations or abstained, the rationale was disclosed publicly
- □ (C) In cases where we voted against management recommendations or abstained, we did not communicate the rationale
- \square (D) We did not vote against management or abstain

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 22.1	CORE	LE 22	N/A	PUBLIC	Voting disclosure post AGM/EGM	2

Indicate the proportion of votes where you and/or the service provider(s) acting on your behalf communicated the rationale for your voting decisions.

(B) In cases where we voted against management recommendations or abstained, the rationale was disclosed publicly

(5) > 95%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 23	CORE	OO 9 LE	LE 23.1	PUBLIC	Voting disclosure post AGM/EGM	2, 5

Did your organisation and/or the service provider(s) acting on your behalf communicate the rationale for your voting decisions when voting against a shareholder resolution proposed/filed by a PRI signatory?

- (A) In cases where we voted against a shareholder resolution proposed/filed by a PRI signatory, the rationale was disclosed publicly
- \square (B) In cases where we voted against a shareholder resolution proposed/filed by a PRI signatory, the rationale was not disclosed publicly
- \Box (C) We did not vote against any shareholder resolution proposed/filed by a PRI signatory

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 23.1	CORE	LE 23	N/A	PUBLIC	Voting disclosure post AGM/EGM	2, 5

Indicate the proportion of votes where you and/or the service provider(s) acting on your behalf communicated the rationale for your voting decisions.

(A) In cases where we voted against a shareholder resolution proposed/filed by a PRI signatory, the rationale was disclosed publicly (5) > 95%

Fixed Income (FI)

Pre-investment phase

Materiality analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 10	FI 1.1	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify material ESG factors for its fixed income assets?

	(1) SSA	(2) Corporate
(A) Yes, we have a formal process to identify material ESG factors for all of our assets	•	•
(B) Yes, we have a formal process to identify material ESG factors for the majority of our assets	0	0
(C) Yes, we have a formal process to identify material ESG factors for a minority of our assets	0	0
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their own discretion	O	0
(E) No, we do not have a formal process to identify material ESG factors	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1.1	CORE	FI 1	N/A	PUBLIC	Materiality analysis	1

How does your current investment process incorporate material ESG factors?

	(1) SSA	(2) Corporate
(A) The investment process incorporates material governance factors		
(B) The investment process incorporates material environmental and social factors		 ✓
(C) The investment process incorporates material ESG factors beyond our organisation's typical investment time horizon	Ø	
(D) The investment process incorporates the effect of material ESG factors on revenues and business operations	Ø	✓

ESG risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 10	FI 2.1	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate
(A) Investment committee members, or the equivalent function/group, have a qualitative ESG veto		

and currency	es, sectors, countries are monitored for SG exposure and for isk limits		Ø		Ø	
ESG factors is portfolio cons hedging adjust depending on	xposure to specific is measured for our struction, and sizing or stments are made individual issuers' these factors		Ø		Z	
ESG factors i	ethod of incorporating into risk management se specify below:					
	ot have a process to CSG factors into our management					
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2.1	CORE	FI 2	N/A	PUBLIC	ESG risk management	1
For what proprocess?	oportion of your fixed inco	ome assets are mat	erial ESG factor	s incorporated	into your portfolio risk m	anagement
(1) SSA						
(A) Investme qualitative ES	ent committee members, o	r the equivalent fu	anction/group, h	ave a	(1) for all of our ass	sets
. , -	es, sectors, countries and for breaches of risk limits	-	itored for change	es in ESG	(1) for all of our ass	sets
	xposure to specific ESG fa hedging adjustments are ors				(1) for all of our ass	sets
(2) Corporate	e					
	(A) Investment committee members, or the equivalent function/group, have a qualitative ESG veto				(1) for all of our ass	sets

(B) Companies, sectors, countries and currency are monitored for changes in ESG exposure and for breaches of risk limits	(1) for all of our assets
(C) Overall exposure to specific ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on individual issuers' sensitivity to these factors	(1) for all of our assets

ESG incorporation in asset valuation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 10	FI 3.1	PUBLIC	ESG incorporation in asset valuation	1

How do you incorporate the evolution of ESG factors into your fixed income asset valuation process?

	(1) SSA	(2) Corporate
(A) We incorporate it into the forecast of cash flow, revenues and profitability		
(B) We anticipate how the evolution of ESG factors may change the ESG profile of the debt issuer	☑	☑
(C) We do not incorporate the evolution of ESG factors into our fixed income asset valuation process		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3.1	CORE	FI 3	N/A	PUBLIC	ESG incorporation in asset valuation	1

In what proportion of cases do you incorporate the evolution of ESG factors into your fixed income asset valuation process?

(1)	SSA

(B) We anticipate how the evolution of ESG factors may change the ESG profile of the debt issuer	(1) in all cases
(2) Corporate	
(B) We anticipate how the evolution of ESG factors may change the ESG profile of the debt issuer	(1) in all cases

Performance monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	PLUS	OO 5.2 FI, OO 10	N/A	PUBLIC	Performance monitoring	1

Provide an example of an ESG factor that your organisation incorporated into your fixed income valuation or portfolio construction and describe how that affected the returns of those assets.

	Example:
(A) Example from your active management strategies:	Storebrand Global Credit IG is a Global active fixed income strategy that avoids investment in fossil fuels and follows an extended version of the Storebrand standard exclusion list. This fund achieved a return of 6,0% in 2020 compared to the reference index BBgBarc Gbl Corporate return of 1,5%

(B) Example from your passive management strategies:

Storebrand Likviditet is a low risk fixed income strategy that avoids investment in fossil fuels and follows an extended version of the Storebrand standard exclusion list. This fund achieved a return of 1,6 % in 2020 compared with a 0,6% return for the reference index.

ESG incorporation in portfolio construction

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 10	FI 5.1	PUBLIC	ESG incorporation in portfolio construction	1

How do ESG factors influence your portfolio construction?

(1) SSA	(2) Corporate
Ø	
Ø	
Ø	
Ø	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5.1	CORE	FI 5	N/A	PUBLIC	ESG incorporation in portfolio construction	1

In what proportion of cases do ESG factors influence your portfolio construction?

(1) SSA

(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases
(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process	(1) in all cases
(2) Corporate	
(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases
(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process	(1) in all cases

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	PLUS	OO 10	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Please provide two examples of how ESG factors have influenced weightings and tilts in either passive or active fixed income.

Please provide examples below: : SPP Grön Obligationsfond is a sustainable, actively managed fixed income fund that invests in what are known as green bonds. Green bonds are defined as bonds and other interest-bearing financial instruments with an explicit sustainability profile, which have a clearly positive impact on the environment and society, and include, for example, green bonds, sustainable bonds, climate bonds and socially (A) Example 1: responsible bonds. The fund invests primarily in interestbearing securities issued in Swedish kronor but can also invest in interest-bearing securities in other currencies. The fund follows our standard for sustainable investments, which means, among other things, that we refrain from investing in companies that are in breach of international standards and conventions. (response continued in row below) These include human rights, labour law and international law, corruption and financial crime, serious climate and environmental damage, and controversial weapons (land mines, cluster bombs and nuclear weapons). We also exclude companies where more than 5 per cent of net sales come from the production and/or distribution of tobacco, weapons, alcohol, gambling, pornography or cannabis. The fund excludes the whole of sector 10 Energy (extraction of coal, oil, gas) and companies where 50 per cent of net sales come from the production and/or distribution of fossil fuels in other

sectors or companies with large fossil reserves..

(B) Example 2:

SPP Global Företagsobligation Plus is a sustainable, actively managed fixed income fund that invests in corporate bonds issued by companies in Europe and the USA with high creditworthiness, The fund follows our standard for sustainable investments, which means, among other things, that we refrain from investing in companies that are in breach of international standards and conventions. These include human rights, labour law and international law, corruption and financial crime, serious climate and environmental damage, and controversial weapons (land mines, cluster bombs and nuclear weapons). We also exclude companies where more than 5 per cent of net sales come from the production and/or distribution of fossil fuels, tobacco, weapons, alcohol, gambling, pornography, cannabis or companies with large fossil reserves.

ESG incorporation in assessment of issuers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 7	CORE	OO 10	N/A	PUBLIC	ESG incorporation in assessment of issuers	1

When assessing issuers'/borrowers' credit quality, how does your organisation incorporate material ESG risks in the majority of cases?

	(1) SSA	(2) Corporate
(A) In the majority of cases, we incorporate material governance-related risks	0	0
(B) In addition to incorporating governance-related risks, in the majority of cases we also incorporate material environmental and social risks	•	•
(C) We do not incorporate material ESG risks for the majority of our credit quality assessments of issuers/borrowers	0	0

ESG performance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 10	N/A	PUBLIC	ESG performance	1

In the majority of cases, how do you assess the relative ESG performance of a borrower within a peer group as part of your investment process?

	(1) SSA	(2) Corporate
(A) We use the relative ESG performance of a borrower to adjust the internal credit assessments of borrowers by modifying forecasted financials and future cash flow estimates		
(B) We use the relative ESG performance of a borrower to make relative sizing decisions in portfolio construction	☑	Ø
(C) We use the relative ESG performance of a borrower to screen for outliers when comparing credit spreads to ESG relative performance within a similar peer group	☑	Ø
(D) We consider the ESG performance of a borrower only on a standalone basis and do not compare it within peer groups of other benchmarks		
(E) We do not have an internal ESG performance assessment methodology		

ESG risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 9	CORE	OO 10	FI 9.1	PUBLIC	ESG risk management	1

For your corporate fixed income, does your organisation have a framework that differentiates ESG risks by issuer country and sector?

- (A) Yes, it differentiates ESG risks by country/region (for example, local governance and labour practices)
- ☑ (B) Yes, it differentiates ESG risks by sector
- □ (C) No, we do not have a framework that differentiates ESG risks by issuer country/region and sector

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 9.1	CORE	FI 9	N/A	PUBLIC	ESG risk management	1

For what proportion of your corporate fixed income assets do you apply your framework for differentiating ESG risks by issuer country/sector?

	(1) for all of our corporate fixed income assets	(2) for the majority of our corporate fixed income assets	(3) for a minority of our corporate fixed income assets
(A) We differentiate ESG risks by country/region (for example, local governance and labour practices)	•	0	0
(B) We differentiate ESG risks by sector	•	0	0

Post-investment phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 10	N/A	PUBLIC	ESG risk management	1

Do your regular reviews incorporate ESG risks?

	(1) SSA	(2) Corporate
(A) Our regular reviews include quantitative information on material ESG risks specific to individual fixed income assets	Ø	☑
(B) Our regular reviews include aggregated quantitative information on material ESG risks at a fund level	Ø	☑
(C) Our regular reviews only highlight fund holdings where ESG ratings have changed		
(D) We do not conduct regular reviews. Risk reviews of ESG factors are conducted at the discretion of the individual fund manager and vary in frequency		
(E) We do not conduct reviews that incorporate ESG risks		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 10	N/A	PUBLIC	ESG risk management	1

Do you regularly identify and incorporate ESG incidents into the investment process for your fixed income assets?

	(1) SSA	(2) Corporate
(A) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into all of our investment decisions	•	•
(B) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into the majority of our investment decisions	0	0
(C) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into a minority of our investment decisions	0	0
(D) Yes, we have an ad hoc process in place for identifying and incorporating ESG incidents	0	0
(E) We do not have a process in place for regularly identifying and incorporating ESG incidents into our investment decision-making	0	0

Time horizons

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	CORE	OO 10	N/A	PUBLIC	Time horizons	1

In the majority of cases, how does your investment process account for differing time horizons of holdings and how they may affect ESG factors?

	(1) SSA	(2) Corporate
(A) We take into account current risks	Ø	
(B) We take into account medium- term risks		
(C) We take into account long-term risks		
(D) We do not take into account differing time horizons of holdings and how they may affect ESG factors		

Long-term ESG trend analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 15	CORE	OO 10	N/A	PUBLIC	Long-term ESG trend analysis	1

Do you continuously monitor a list of identified long-term ESG trends related to your fixed income assets?

	(1) SSA	(2) Corporate
(A) We monitor long-term ESG trends for all of our assets	•	

(B) We monitor long-term ESG trends for the majority of our assets	o	0
(C) We monitor long-term ESG trends for a minority of our assets	0	0
(D) We do not continuously monitor long-term ESG trends in our investment process	o	0

Passive

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	OO 5.2 FI, OO 10	N/A	PUBLIC	Passive	1

What percentage of your total passive fixed income assets utilise an ESG index or benchmark?

0.0%

Examples of leading practice

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	PLUS	OO 10	N/A	PUBLIC	Examples of leading practice	1 to 6

Describe any leading responsible investment practices that you have adopted for some or all of your fixed income assets.

	Description per fixed income asset type:			
(A) SSA	Oor SSA screening process identifies high risk countries on the basis of a wide range of data sets including themes such as anti-corruption, human rights and governance practices. We maintain an exclusion list that is updated quareterly and applies to all Storebrand AuM.			
(B) Corporate	Our Corporate Bond funds actively seek to invest in green bonds and have steadily increased their exposure over time.			

Thematic bonds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	PLUS	OO 6 FI	FI 18.1	PUBLIC	Thematic bonds	1

What proportion of your total thematic investments are labelled green bonds, social bonds and/or sustainability bonds by the issuers in accordance with the four ICMA Social/Green Bond Principles?

Proportion out of total thematic fixed income investments:

Indicator						PRI Principle
FI 18.1	PLUS	FI 18	N/A	PUBLIC	Thematic bonds	3

What proportion of your social, green and/or sustainability labelled bonds has been subject to an independent review arranged by the issuer?

(A) Second-party opinion	(5) > 75%
(B) Third-party assurance	(5) > 75%
(C) Green bond rating	(5)>75%
(D) Climate Bonds Certification according to the Climate Bonds Standard	(1) 0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 19	CORE	OO 6 FI	N/A	PUBLIC	Thematic bonds	1

How do you determine which non-labelled thematic bonds to invest in?

- (A) By reviewing the bond's use of proceeds
- ☑ (B) By reviewing companies' ESG targets
- ☑ (C) By reviewing companies' progress towards achieving ESG targets
- \Box (D) We do not invest in non-labelled the matic bonds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 20	CORE	OO 6 FI	N/A	PUBLIC	Thematic bonds	1, 2, 6

What action do you take in the majority of cases where proceeds of a thematic bond issuer are not allocated to the original plan?

- \square (A) We engage with the issuer
- \square (B) We alert regulators
- \square (C) We alert the matic bond certification agencies
- (D) We sell the security
- ☑ (E) We publicly disclose the breach
- \square (F) We blacklist the issuer
- \square (G) Other action, please specify:
- \square (H) We do not take any specific actions when proceeds from bond issuers are not allocated in accordance with the original plan

Reporting/Disclosure

ESG screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 21	CORE	OO 6 FI	N/A	PUBLIC	ESG screens	6

How do you ensure that clients and/or beneficiaries understand ESG screens and their implications?

(A) We publish a list of ESG screens and share it on a publicly accessible platform such as a website or through fund documentation Voluntary URL link(s) to list of ESG screens:

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/_/attachment/inline/d55a1ad8-adbf-40c9-9c3f-68ef6c7d554f:440ad5a507c45c403cf618fe3b4f8f3e6c85e591/45359A%20Q1%20Liste%20over%20Storebrands%20utelukkelser%202021 ENG.pdf$

- (1) for all of our fixed income assets subject to ESG screens
- (B) We publish any changes in ESG screens and share it on a publicly accessible platform such as a website or through fund documentation Voluntary URL link(s) to ESG screen changes:

 $https://www.storebrand.no/en/asset-management/sustainable-investments/exclusions/_/attachment/inline/d55a1ad8-adbf-40c9-9c3f-68ef6c7d554f:440ad5a507c45c403cf618fe3b4f8f3e6c85e591/45359A%20Q1%20Liste%20over%20Storebrands%20utelukkelser%202021 ENG.pdf$

- (1) for all of our fixed income assets subject to ESG screens
- (C) We outline any implications of ESG screens, such as deviation from a benchmark or impact on sector weightings, to clients and/or beneficiaries
- (1) for all of our fixed income assets subject to ESG screens

Engagement

Engaging with issuers/borrowers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 22	CORE	OO 9 FI	FI 22.1	PUBLIC	Engaging with issuers/borrowers	2

At which stages does your organisation engage with issuers/borrowers?

	(2) Corporate	
(A) At the pre-issuance/pre-deal stage		
(B) At the pre-investment stage		
(C) During the holding period		
(D) At the refinancing stage		
(E) When issuers/borrowers default		

Indicator						PRI Principle
FI 22.1	PLUS	FI 22	N/A	PUBLIC	Engaging with issuers/borrowers	2

Describe your approach to engagement.

Engagement approach per fixed income asset type or general description for all your fixed income engagement:

(A) Description of engagement approach for all of our fixed income

SSA: In the course of 2020 Storebrand launched an engagement process to influence a state issuer, the Government of Brazil to manage deforestation in the Amaxon more effectively. Storebrand is exposed to the deforestation issue both through indirect investment in Brazilian state issued bonds (through an externally managed Emerging Market Debt Fund) but also through exposure to companies that have activities or supply chain issues in Brazil. This approach was successful in raising awareness on both a state and company level of deforestation drivers in Brazil.

(D) Description of engagement approach for our corporate fixed income

Corporate: Storebrand engages both proactively and reactively on a range of ESG issues. We strongly believe that collaborative engagement is the most effective way of engaging with companies and prioritise engagement through investor alliances wherever possible. Engagements take place reguarly and we regard it as Best Practice to involve both portfolio managers and ESG specialists in the engagement process.

Real Estate (RE)

Policy

Investment guidelines

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policies?

- □ (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail, education etc.)
- ☑ (B) Guidelines on our ESG approach to new construction
- ☑ (D) Guidelines on our ESG approach to standing real estate investments
- ☑ (E) Guidelines on our engagement approach related to property managers
- (F) Guidelines on our engagement approach related to tenants
- (G) Guidelines on our engagement approach related to construction contractors
- (H) Guidelines on excluding certain tenants based on responsible investment considerations
- \square (I) Our policies do not cover real estate-specific ESG guidelines

Fundraising

Commitments to investors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 2	CORE	N/A	N/A	PUBLIC	Commitments to investors	1, 4

For all of your funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs) or side letters? (If you did not close any funds during this reporting year, refer to the last reporting year in which you did close funds.)

- (A) We incorporated responsible investment commitments in LPAs as a standard, default procedure
- \square (B) We added responsible investment commitments in LPAs upon client request
- \square (C) We added responsible investment commitments in side letters upon client request
- □ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- \square (E) Not applicable as we have never raised funds
- \square (F) Not applicable as we have not raised funds in the last 5 years

Pre-investment phase

Materiality analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3	CORE	N/A	RE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

(A) We assessed materiality at the asset level, as each case is unique	(1) for all of our potential real estate investments
(B) We performed a mix of property type and asset-level materiality analysis	(4) for none of our potential real estate investments
(C) We assessed materiality according to property type only	(4) for none of our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3.1	CORE	RE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

- ☑ (A) We used GRI Standards to inform our real estate materiality analysis
- \square (B) We used SASB to inform our real estate materiality analysis
- \square (C) We used climate risk disclosures such as the TCFD recommendations (or other climate risk analysis tools) to inform our real estate materiality analysis
- (D) We used geopolitical and macro-economic considerations in our real estate materiality analysis
- \square (E) Other, please specify:

Due diligence

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	N/A	N/A	PUBLIC	Due diligence	1

During the reporting year, how did ESG factors affect the selection of your real estate investments?

(A) ESG factors helped identify risks	(1) for all of our potential real estate investments
(B) ESG factors were discussed by the investment committee (or equivalent)	(1) for all of our potential real estate investments
(C) ESG factors helped identify remedial actions for our 100-day plans (or equivalent)	(1) for all of our potential real estate investments
(D) ESG factors helped identify opportunities for value creation	(1) for all of our potential real estate investments
(E) ESG factors led to the abandonment of potential investments	(4) for none of our potential real estate investments
(F) ESG factors impacted investments in terms of price offered and/or paid by having an effect on revenue assumptions	(1) for all of our potential real estate investments
(G) ESG factors impacted investments in terms of price offered and/or paid by having an effect on CAPEX assumptions	(4) for none of our potential real estate investments

(H) ESG factors impacted investments in terms of price offered and/or paid by having an effect on OPEX assumptions	(4) for none of our potential real estate investments
(I) ESG factors impacted investments in terms of price offered and/or paid by having an effect on the cost of capital or discount rate assumptions	(1) for all of our potential real estate investments
(J) Other, please specify: NA	(4) for none of our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	N/A	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential investments?

(A) We do a high-level/desktop review against an ESG checklist for initial red flags	(1) for all of our potential real estate investments
(B) We send detailed ESG questionnaires to target properties	(1) for all of our potential real estate investments
(C) We hire third-party consultants to do technical due diligence on specific issues	(1) for all of our potential real estate investments
(D) We conduct site visits and in-depth interviews with management and personnel	(3) for a minority of our potential real estate investments
(E) We incorporate actions based on the risks and opportunities identified in the due diligence process into our post-investment plans	(1) for all of our potential real estate investments
(F) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence (e.g. commercial, accounting and legal)	(1) for all of our potential real estate investments
(G) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence (e.g. commercial, accounting and legal)	(1) for all of our potential real estate investments

(4) for none of our potential real estate investments

Selection, appointment and monitoring of third-party property managers

Selection process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process	1, 4

During the reporting year, how did you include ESG factors in all of your selections of external property managers? (If you did not select external property managers during the reporting year, report on the most recent year in which you selected external property managers.)

- (A) We requested information from potential managers on their overall approach to ESG
- \square (B) We requested track records and examples from potential managers on how they manage ESG factors
- \square (C) We requested information from potential managers on their engagement process(es) with stakeholders
- ☑ (D) We requested documentation from potential managers on their responsible procurement practices (including responsibilities, approach and incentives)
- \square (E) We requested the assessment of current and planned availability and aggregation of metering data from potential managers
- \square (F) Other, please specify:
- \Box (G) We did not include ESG factors in our selection of external property managers

Appointment process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process	1, 4

How did you include ESG factors in the appointment of your current external property managers?

(A) We set dedicated ESG procedures in all relevant property management phases	(1) for all of our external property managers
(B) We set clear ESG reporting requirements	(1) for all of our external property managers

(C) We set clear ESG performance targets	(3) for a minority of our external property managers
(D) We set incentives related to ESG targets	(3) for a minority of our external property managers
(E) We included responsible investment clauses in property management contracts	(1) for all of our external property managers
(F) Other, please specify: NA	(4) for none of our external property managers

Monitoring process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle				
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process	1, 4				
How do you inc	clude ESG factors in the	e monitoring of ext	ernal property n	nanagers?						
(A) We monitor targets	(A) We monitor performance against quantitative and/or qualitative environmental (1) for all of our external property managers									
(B) We monitor performance against quantitative and/or qualitative social targets (1) for all of our external property managers										
(C) We moniton	r performance against q	(1) for all of our external property managers								
(D) We moniton	r progress reports on er	gagement with ten	ants		(4) for none of our external property managers					
(E) We require	formal reporting on an	annual basis as a ı	ninimum		(1) for all of our extended managers	ternal property				
(F) We have regular discussions about ESG factors with all relevant stakeholders (4) for none of our external property managers										
· ,	t a performance review ancial incentive structur	-	on ESG alignmer	nt linked to	(4) for none of our property managers	external				

(H) We have internal/external parties conduct site visits at least once a year	(4) for none of our external property managers
(I) Other, please specify: NA	(4) for none of our external property managers

Construction and development

Construction requirements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	OO 24	N/A	PUBLIC	Construction requirements	1

What sustainability requirements do you currently have in place for all development projects and major renovations?

- ☑ (A) We require the management of waste by diverting construction and demolition materials from disposal
- □ (B) We require the management of waste by diverting reusable vegetation, rocks and soil from disposal
- (C) We require the minimisation of light pollution to the surrounding community
- □ (D) We require the minimisation of noise pollution to the surrounding community
- ☑ (E) We require the performance of an environmental site assessment
- (F) We require the protection of the air quality during construction
- \square (G) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- \square (H) We require the protection of surface and ground water and aquatic ecosystems by controlling and retaining construction pollutants
- (I) We require the constant monitoring of health and safety at the construction site
- \square (J) Other, please specify:
- □ (K) We do not have sustainability requirements in place for development projects and major renovations

Minimum building requirements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	OO 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

(A) We require the implementation of the latest available metering and IoT technology	(1) for all development projects and major renovations
(B) We require that the building be able to obtain a recognised green building certification for new buildings	(1) for all development projects and major renovations
(C) We require the use of certified (or labelled) sustainable building materials	(1) for all development projects and major renovations
(D) We require the installation of renewable energy technologies where feasible	(1) for all development projects and major renovations
E) We require that development projects and major renovations become net-zero arbon emitters within five years of completion of the construction	(4) for none of our development projects and major renovations
F) We require water conservation measures	(2) for the majority of our development projects and major renovations
G) We require common occupant health and well-being measures	(1) for all development projects and major renovations
H) Other, please specify:	(4) for none of our development
NA	projects and major renovations

Post-investment phase

Monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle			
RE 11	CORE	N/A	N/A	PUBLIC	Monitoring	1			
During the re	During the reporting year, what ESG building performance data did you collect for your real estate assets?								
Through met	Through metering								
(A) Electricity	y consumption			((1) for all of our	real estate assets			
(B) Water con	nsumption			((1) for all of our	real estate assets			
(C) Waste pr	oduction			((1) for all of our	real estate assets			
Through another	ther method								
(A) Electricit	y consumption				(4) for none of our	ır real estate			
(B) Water consumption (4) for none of our assets						ır real estate			
(C) Waste pr	oduction				(4) for none of ou	ır real estate			

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	N/A	N/A	PUBLIC	Monitoring	1

For the majority of the core KPIs that you tracked, how did you set targets across your real estate investments?

- (A) We set targets to achieve incremental improvements based on past performance
- \square (B) We set targets using industry benchmarks/standards
- (C) We set targets against global benchmarks or thresholds (e.g. on climate change and/or the SDGs)
- □ (D) We did not set targets for the core ESG KPIs that we tracked
- \Box (E) We did not set targets as we don't track core ESG KPIs

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	OO 26	RE 13.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your ESG targets for your real estate investments?

(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance	(1) for all of our real estate investments
(B) We implement certified environmental and social management systems across our portfolio	(1) for all of our real estate investments
(C) We make sufficient budget available to ensure that the systems and procedures needed to achieve the target are put in place	(1) for all of our real estate investments
(D) We hire external verification services to audit performance, systems and procedures	(1) for all of our real estate investments
(E) We collaborate and engage with our external property managers to develop action plans to achieve targets	(1) for all of our real estate investments
(F) We develop minimum health and safety standards	(3) for a minority of our real estate investments
(G) Other, please specify: NA	(4) for none of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 14	CORE	N/A	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG-related risks and opportunities to create value during the holding period of your investments?

(A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings	(1) for all of our real estate investments
(B) We adjust our ESG action plans regularly based on performance monitoring findings	(1) for all of our real estate investments
(C) We hire external advisors to provide support with specific ESG value creation opportunities	(1) for all of our real estate investments
(D) Other, please specify: NA	(4) for none of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	CORE	N/A	N/A	PUBLIC	Monitoring	1

What proportion of your real estate assets have obtained an ESG/RI certification or label?

- o (A) All of our real estate assets have obtained an ESG/RI certification or label
- o (B) The majority of our real estate assets have obtained an ESG/RI certification or label
- (C) A minority of our real estate assets have obtained an ESG/RI certification or label
- \circ (D) None of our real estate assets have obtained an ESG/RI certification or label

${\bf Stewardship}$

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	OO 26	N/A	PUBLIC	Stewardship	1, 2

How does your property manager engage with tenants? (If you are a property manager, please report on your direct tenant engagement.)

${\bf Tenants\ without\ operational\ control}$

(A) We engage with real estate tenants through organising tenant events focused on ncreasing sustainability awareness, ESG training and guidance	(1) for all of our buildings or properties
(B) We engage with real estate tenants on energy and water consumption and/or waste production	(1) for all of our buildings or properties
C) We engage with real estate tenants by offering green leases	(1) for all of our buildings or properties
D) We engage with real estate tenants through identifying collaboration opportunities hat support net-zero targets	(3) for a minority of our building or properties
E) We engage with real estate tenants by offering shared financial benefits from equipment upgrades	(1) for all of our buildings or properties
F) Other, please specify: NA	(4) for none of our buildings or properties

Exit

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	N/A	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information has your organisation shared with potential buyers of real estate investments?

(A) We shared our firm's high-level commitment to responsible investment (e.g. that we are a PRI signatory)	(1) for all of our real estate investments
B) We shared a description of what industry and asset class standards our firm aligns with (e.g. TCFD, GRESB)	(1) for all of our real estate investments
C) We shared our firm's responsible investment policy (at minimum, a summary of key spects and firm-specific approach)	(1) for all of our real estate investments
(D) We shared our firm's ESG risk assessment methodology (topics covered, in-house and/or with external support)	(4) for none of our real estate investments
E) We shared the outcome of our latest ESG risk assessment on the property(s)	(1) for all of our real estate investments
(F) We shared key ESG performance data on the property(s) being sold	(4) for none of our real estate investments
(G) Other, please specify: NA	(4) for none of our real estate investments

Reporting/Disclosure

ESG portfolio information

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 19	CORE	N/A	N/A	PUBLIC	ESG portfolio information	6

During the reporting year, how did you report on core ESG data and targets to your investors or beneficiaries?

- \square (A) We reported in aggregate through a publicly disclosed sustainability report
- ☑ (B) We reported in aggregate through formal reporting to investors or beneficiaries
- □ (C) We reported at the property level through formal reporting to investors or beneficiaries
- □ (D) We reported through a limited partners advisory committee (or equivalent)
- ☑ (E) We reported back at digital or physical events or meetings with investors or beneficiaries
- ☑ (F) We did ad hoc or informal reporting on serious ESG incidents
- \square (G) Other, please specify:
- Reported to GRESB and distributed /disclosed teh banchmark reports.
- \square (H) We did not report on core ESG data and targets to our investors or beneficiaries during the reporting year

Sustainability Outcomes (SO)

Set targets on sustainability outcomes

Outcome objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	ISP 45	SO 1.1, SO 2	PUBLIC	Outcome objectives	1

Has your organisation chosen to shape any specific sustainability outcomes?

(A) Yes

∘ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 3	PUBLIC	Outcome objectives	1

Please list up to 10 of the specific sustainability outcomes that your organisation has chosen to shape.

Sustainability outcomes

(A) Sustainability Outcome $\#1$	Reduce the carbon footprint in the Storebrand G
(B) Sustainability Outcome #2	Investments in solutions: NOK billion/ share of to
(C) Sustainability Outcome $\#3$	Carbon intensity property investments: $co2/m2$
(D) Sustainability Outcome #4	Property investments with green certificates: shar

Target-setting process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 2	SO 3.1	PUBLIC	Target-setting process	1

Have you set any targets for your sustainability outcomes? Indicate how many targets you have set for each sustainability outcome.

(A) Sustainability Outcome #1:	(2) One target
(B) Sustainability Outcome #2:	(2) One target
(C) Sustainability Outcome #3:	(2) One target
(D) Sustainability Outcome #4:	(2) One target

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3.1	PLUS	SO 3	Multiple, see guidance	PUBLIC	Target-setting process	1

For each sustainability outcome, name and provide a brief description of up to two of your targets and list the metrics or key performance indicators (KPIs) associated with them, the targets' deadlines and the percentage of your assets under management to which the targets apply.

Target name	Target description
carbon footprint reduction	reduce the carbon footprint46) in the Storebrand Group's total equities, corporate bond, and real estate investments
Investment in Solutions companies	Investments in solutions: NOK billion/ share of total AUM
Carbon Intensity Property	Carbon Intensity $\cos 2/m2$
	carbon footprint reduction Investment in Solutions companies

(D1) Sustainability Outcome #4: (Target 1)	Property investments wi certificates:	th green Share of property investments with Green certificates
	KPIs/metrics	Target deadline: Year
(A1) Sustainability Outcome #1: (Target 1)	32% decline according to 2018	base year 2025
(B1) Sustainability Outcome #2: (Target 1)	15% of total AuM	2025
(C1) Sustainability Outcome #3: (Target 1)	$6,5 ext{ tonn}$	2025
(D1) Sustainability Outcome #4: (Target 1)	74%	2025
	Со	verage: % of assets under management
(A1) Sustainability Outcome #1: (Targe	et 1) 100)
(B1) Sustainability Outcome #2: (Targe	t 1) 100)
(C1) Sustainability Outcome #3: (Targe	et 1) 5	
(D1) Sustainability Outcome #4: (Targe	et 1) 5	

Indicator						PRI Principle
SO 4	PLUS	SO 3.1	N/A	PUBLIC	Target-setting process	1

Which global goals (or other references) did your organisation use to determine your sustainability outcomes targets? Explain whether you have derived your target from global goals, e.g. by translating a global goal into a target at the national, regional, sub-national, sectoral or sub-sectoral level. Alternatively, explain why you have set your target independently from global goals.

	Global goals/references
(A1) Sustainability Outcome #1: (Target 1)	UN Sustainable Development Goal 13 Climate Action

(B1) Sustainability Outcome #2: (Target 1)	UN Sustainable Development Goals $3, 7, 11$ and 13
(C1) Sustainability Outcome #3: (Target 1)	UN Sustainable Development Goal 7 Energy
(D1) Sustainability Outcome #4: (Target 1)	UN Sustainable Development Goal 7 Energy

Tracking progress

SO 5.2

PLUS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 3.1	SO 5.1, SO 5.2	PUBLIC	Tracking progress	1
Does your org	anisation track intermedi	iate performance a	nd progress against	your sustaina	bility outcomes targets	?
(A1) Sustaina	bility Outcome #1: (Tar	get 1)			(1) Yes	
(B1) Sustaina	bility Outcome #2: (Tar	get 1)			(1) Yes	
(C1) Sustaina	bility Outcome #3: (Tar	rget 1)			(1) Yes	
(D1) Sustaina	bility Outcome #4: (Tar	eget 1)			(1) Yes	
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle

Describe any qualitative or quantitative progress achieved during the reporting year against your sustainability outcomes targets.

N/A

PUBLIC

Tracking progress

SO 5

	(1) Qualitative progress	(2) Quantitative progress
(A1) Sustainability Outcome #1: (Target 1)	In 2020 we launched a new climate strategy. This entails, among other things, that Storebrand will no longer invest in companies that receive more than 5 per cent of their revenues from coal, oil sands-based activities,	We aim to reduce the carbon footprint in the Storebrand Group's total equities, corporate bond, and real estate investments by at least 32 per cent by 2025 with the base year in 2018

(B1) Sustainability Outcome #2: (Target 1)	Continuous growth in investments in sustainable family of funds indicates that Storebrand is on track to achieve the 2025 target.	2020: 92,6 billion NOK $/$ 9,6 $\%$
(C1) Sustainability Outcome #3: (Target 1)	Commitment to energy efficiency and greenhouse gas emissions: Continuous improvements in energy efficiency are achieved through several measures to optimise operations. The total carbon emissions in direct real estate investments continued to decrease, ending at 8 456 tons of CO2equivalents in 2020, or 7.9kg CO2e/m2.	2020: 7,9 tonn $\cos 2/m2$
(D1) Sustainability Outcome #4: (Target 1)	Long-term target of 100 per cent environmentally certified property. The share of direct real estate investments that had green certificates in 2020 was 43 per cent	2020: 43%

Indicator	Type of indicator	Dependent on	Gateway to			PRI Principle
SO 6	PLUS	SO 3.1	SO 6.1	PUBLIC	Tracking progress	2

Despite your organisation's efforts to make progress on your sustainability outcomes, there may be stakeholders who have been negatively affected by your organisation's activities. For each of your sustainability outcomes, indicate whether your organisation ensures that stakeholders who have been negatively affected are able to seek an effective remedy.

(A) Sustainability Outcome #1:	(2) No
(B) Sustainability Outcome #2:	(2) No
(C) Sustainability Outcome #3:	(2) No
(D) Sustainability Outcome #4:	(2) No

Investors' individual and collective actions shape outcomes

Asset allocation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 7	N/A	PUBLIC	Asset allocation	1

Describe how your organisation used asset allocation specifically to make progress on your sustainability outcomes during the reporting year, excluding participation in structures involving other stakeholders, such as blended finance. Provide details on how you expect these measures to make a significant change to the cost and/or availability of capital to finance progress on your sustainability outcomes.

Please describe below: Storebrand will no longer invest in companies that receive more than 5 per cent of their revenues from coal, oil sandsbased activities, are involved in severe and/or systematically unsustainable production of palm oil, soy, cattle and timber. This can reduce deforestation risk in portfolios, in line with (A) Sustainability Outcome #1: our deforestation policy, or in companies that deliberately and systematically work against the goals and targets enshrined in the Paris Agreement 52), for example through lobbying. In addition, by 2025 our investment portfolio shall be completely free from companies that contribute to illegal deforestation. Storebrand aims to expand the portfolios of Solutions companies in existing funds and portfolios thus channelling (B) Sustainability Outcome #2: capital towards sustainable solutions. The EU taxonomy and associated regulations are expected to positively affect the value and access to capital of these companies Outcomes are influenced by operational improvements are the (C) Sustainability Outcome #3: catalyst for improvements rather than asset allocation Outcomes are influenced by operational improvments rather (D) Sustainability Outcome #4: than asset allocation

Global stakeholders collaborate to achieve outcomes

Tracking progress against global goals

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 23	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation engage with standard setters, reporting bodies or similar organisations to help track and communicate progress against global sustainability goals?

• (A) Yes. Please describe:

Storebrand engages through working groups at national finance bodies such as Finance Norway and VFF to engage and influence standard setters.

o (B) No. Please describe why not:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 24	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation contribute to public goods (such as research) or public discourse (such as media coverage) to make progress on global sustainability goals?

Storebrand is an active player in the national and international media on issues such as deforestation, anti climate policy lobbying, Paris alignment and target setting, human rights issues and gender equality.

 \circ (B) No. Please describe why not: