Danske Invest Fund Management Ltd.



# Active Ownership Report 2024

Danske Invest

\* The report has been updated and republished with a correction to a reference under the Glossary.

### Active Ownership Report



When investors entrust us with their assets and savings, it is our duty to serve their interests by providing investment solutions with the goal of delivering competitive and long-term performance. Our firm commitment to **Responsible Investment** is an integral part of this duty. It is about making better-informed investment decisions – addressing issues of risk, problems, and dilemmas, and influencing our investments through active ownership. The exercise of active ownership activities is in line with our **fiduciary duty**, which is to consider what is in the best interests of our customers.



Active ownership - through direct dialogue, collaborative engagement and where relevant, through voting at general meetings - is an important part of our ability to create long-term value in our investments and to our investors. Our approach is based on the belief that exercising Active Ownership, in certain situations, can facilitate the resolution of challenging issues more effectively than the imposition of exclusions and/or divesting. By remaining invested and engaging, we believe that we are better positioned to influence companies and other issuers to properly manage sustainability-related risks, reduce negative impacts and/or maximise their positive impact on the environment or other societal dimensions, while monitoring their financial performance and management of financial risks.

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The aim of our **Active Ownership Report** covering three parts '**Engagement**', '**Voting**' and '**Collaborative Initiatives**' is to demonstrate how our Active Ownership Policy has been implemented throughout the year.

#### The 3 parts of the report



Part 1 – Engagement



Part 2 -Voting



Part 3 – Collaborative Initiatives

#### Glossary

Active Ownership	The use of rights and position of ownership to influence the activities or behaviour of investee companies and other issuers based on financial and/or impact materiality considerations. Active ownership is exercised by taking an active interest as an investor in the investee companies' circumstances, development, and management, and by adopting a long-term focus in the company in line with, for instance, the EFAMA Stewardship Code and the Shareholder Rights Directive II
Danske Bank or the Bank	Danske Bank A/S
Danske Bank Asset Management	For the purpose of this report, Asset Management covers and represents the assets under management of Danske Bank A/S, Danske Invest Management A/S, Danske Invest Asset Management AS and Danske Invest Fund Management Ltd
Engagement	Refers to the interactions between the investor and current or potential issuers (which may be companies, governments, agencies, municipalities, etc.) on sustainability, governance or other topics tied to the issuer. Engagements may be undertaken to influence (or identify the need to influence) sustainability practices and/or seek information on the sustainable and financial performance of the issuer. Danske Bank exercises individual engagement or in collaboration with other investors and organisations. Engagements are registered and tracked through a centralised application, which is maintained by the Responsible Investment team. Engagements registered in the centralised application platform are classified under Danske Bank's engagement topics taxonomy
Environmental and Social materiality	The inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors
ESG	Environmental, social and/or governance
Financial Materiality	The outside-in impacts that sustainability factors may have on a company's/issuer's economic and financial activities throughout their entire value chain (both upstream and downstream), affecting the value (returns) of such activities
Danske Bank Group or the Group	Danske Bank A/S, its branches and its subsidiaries
Principal Adverse Impacts	A principal adverse impact is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters
Proxy Voting Advisor	A proxy voting advisor provides research, analysis and corresponding services to support investors in the execution of votes at the general meetings of companies
Responsible Investment Policy	The Responsible Investment Policy for Danske Invest
Sustainability factors	Environmental, social and employee-related matters, respect for human rights, anti-corruption and anti-bribery matters
Sustainability risk	An environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment
Voting	Refers to the exercise of ownership rights at General Meetings of companies where we own shares. Voting is carried out on management and/or shareholder resolutions to approve or disapprove of corporate governance as well as relevant environmental and social matters. Voting is exercised by ourselves or by proxy

### Where to get additional information?

Responsible Investment Policy <u>click here</u>	රා Voting Guidelines <u>click here</u>	CS Management of Conflicts of Interest in Active Ownership <u>click here</u>	<b>C</b> Principal Adverse Impact Statement <u>click here</u>
Cick here	Engagement Guidelines <u>click here</u>	Proxy Voting Dashboard click here	<b>CO2</b> Climate Progress Report 2024 <u>click here</u>

#### Our active ownership activities in numbers for 2024



# Part 1 Engagement

#### Introduction to Engagement Activities

Danske Bank Asset Management's Investment and Responsible Investment teams, on behalf of Danske Invest, engage on material sustainability matters in order to seek improvement in performance and processes with the aim of enhancing and protecting the value of investments. They strive to target engagement activities towards issuers, where immediate or longterm sustainability and/or governance related issues, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance, have been identified.

To support the identification of such issues, multiple data sources are reviewed and assessed in an effort to identify potential positive and negative impact of material financial factors and sustainability factors on the performance of the investment and on society.

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In order to ensure a structured engagement process, interactions with issuers are logged and monitored through a centralized application.

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The following pages provide an overview and detailed insights on engagement activities carried out by Danske Bank Asset Management and external managers that are responsible for managing sub-delegated strategies and segregated mandates on behalf of Danske Bank.





# The breadth of engagement activities with corporates in 2024 are represented below



### Top 10 industries

In 2024, 596 companies were engaged with.

The following graph provides insights into the top 10 industries (sectors in brackets) that those companies operated in.



### **Overview of Engagements Across Markets**

In 2024 the 596 companies that were engaged with were domiciled across 35 countries. The table provides insights on the top country domiciles.

Rank	Country	Count of Companies
1	United States	308
2	Croatia	51
3	Finland	44
4	Sweden	27
5	Norway	19
6	France	18
7	China	17
8	Denmark	16
9	Netherlands	14
10	Germany	12



#### Split between engagement categories





Engagement activities are registered and tracked through a centralised application, which is maintained by Danske Bank Asset Management's Responsible Investment team.



Engagements registered in the centralised application platform are classified under Danske's engagement taxonomy. The topics included within the taxonomy are organized under three categories – Environmental, Social and Governance (ESG).



Presented on this page is an overview of the breakdown of total topics discussed, as organized under the ESG categorization.

### Top 7 engagement topics discussed across themes

Engagement interactions with companies may involve more than one ESG topic. As such, below is a presentation of the most discussed topics when considering the total engagement interactions that were held in 2024.

	E			S			G	
Rank	Торіс	Count	Rank	Торіс	Count	Rank	Торіс	Count
1	Net Zero	123	1	Employee Engagement, Diversity & Inclusion	75	1	Board Composition	216
2	Energy Management	120	2	Human Rights & Community Relations	67	2	Executive Compensation	179
3	GHG Emissions	102	3	Employee Retention	65	3	Capital Structure	127
4	Biodiversity	61	4	Data Security	36	4	Corporate Governance	112
5	Energy Transformation	51	5	Labor Standards/ Practices	35	5	Systemic Risk Management	63
6	Water & Wastewater Management	22	6	Employee Health & Safety	34	6	Executive Composition	62
7	Climate Neutrality	21	7	Supply Chain Management	24	7	Dividends	51

#### Top 10 industries most engaged with

In 2024, 596 companies were engaged with. As engagement with these issuers can consist of numerous interactions. The following graph provides insights into the industries with which the greatest number of engagement interactions were held (Sector in bracket).





### Engagement interactions as distributed across countries

As engagement with companies can consist of numerous interactions, below is a presentation of the top 10 domiciles, as categorised by the number of interactions that were held, and presentation of number of interactions held with issuers domiciled in the Nordics.

Country	Count of Interactions
United States	556
Finland	123
Croatia	86
Denmark	81
Norway	68
Sweden	61
France	32
Switzerland	30
Peru	30
China	24
	United States Finland Croatia Denmark Norway Sweden France Switzerland Peru





### **Engagement Categories per Interactions**

Given the breadth of engagement activities, Danske Bank Asset Management approaches and organises engagement interactions across the following categories:



#### **Thematic Related**

The focus of engagements in this category is on addressing systemic issues that multiple companies may be exposed to. Thematic engagements relate to Biodiversity & Nature, Net Zero Commitments (Largest Emitters Focus), Net Zero Pathway Framework (Fossil Fuels Focus), and Human Rights.



#### **Event Related**

Engagement carried out under this category identify issuers with negative operational performance and/or when a severe sustainability event has occurred suggesting that the issuer could implement specific measures to address the sustainability related issue.

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#### Performance Related

Continuous engagement with issuers is a fundamental part of our investment monitoring processes and supports us in gaining an indepth understanding of relevant matters pertaining to the issuer and provides an opportunity to communicate concerns, discuss governance issues, and advocate for responsible business practices.



#### Principal Adverse Impacts (PAIs)

¥ ≝ ⊮ Danske Invest considers principal adverse impacts of its investment decisions on sustainability factors. Active ownership is one strategy that may be exercised to manage principal adverse impacts.



'Principal adverse impacts' means the negative, material or likely to be material effects on sustainability factors caused, compounded by or directly linked to our investment decisions.

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Through the consideration of principal adverse impacts, Danske Invest is monitoring and reporting on 16 mandatory principal adverse impact indicators and six voluntary indicators defined by SFDR. The aim is to address these impacts at different degrees on an investment product and entity level in order to reduce the negative footprint our investments have and/or may have on society. How and to what extent we consider and address principal adverse impacts will evolve over time. Information on how active ownership is utilised to mitigate principal adverse impacts is outlined in our Active Ownership Policy.

#### **Find information**

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			Impact [year n]	Impact [year n-1]	Explenation	Actions taken, and actions planned and targets set for the next reference
		Metric	Impact [year n]	Impact [year n-1]	Explenation	Actions taken, and actions planned and targets set for the next reference

Statement on principal adve	erse impacts
of investment decisions on susta	ainability factors

#### inancial market participant Danske Bank A/S (MAES06222104RZ2U7N

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This statement on principial adverse impacts on sustainability factors covers the reference period from 1\_January 2022 to 31 December 2022. For the reference period of 2022 reporting against each of the relevant indextors will be done not later than 30.June 2023. That report will also include a summary of the principal adverse impacts, a description of actions taken within the relevant reference period and actions planned or targets set for he subsequent period to avoid or reduce the principal adverse impacts description.

#### ammenfatning (DK)

Danake Bank A/S. MAESDGE222104822U7MBG tager hannyn til de waarantligate negative indvirkinger af inne inventeringsbeakturinger af benedgigtighedshertore: Donne erklening er den konsoldeed erklening om die wasentligste negative bindvirkinger af bareingstighedshetzorer Danake Bank A/S og dennes datterselistater Danake Invest Management A/S. Danake Invest Asset Management A/S og Danake Invest Fund Management Ltd., alle finansielle markedsdeitagere, der er underlagt forpligtelse til og/eller har valgt at tage højde for de vassentligste negative Indvirkinger som investeringer kan på bæredsgigtelsdeitkorer.

Denne erklæring om de væsentligste negative indvirkninger på bæredygtighedsfaktorer omfatter referenceperioden fra den 1 januar 2022 til 31 december 2022. Rapporteringen over disse indvirkninger identificeret i referenceperioden vil blive offentliggjort senest 30 juni 2023. Denne rappor

<sup>1</sup> As a francial market participant, the subdetary Danica Person Listinskingaasteanlasis is also dacking the pricepial obverse impacts its investments might have on sustainability locars, but has published a separationer with supplementing experiment and attracts. We approximate and a subdetary and a subdetary approximate the supplement pricepial source and experiment and a subdetary approximate Tables. Also, Source Research pricepial source impacts its investments might have on sustainability locars, but has published a separation of the subdetary tables and a subdetary and a subdetary approximate and a subdetary and a subdetary approximate and a subdetary approximate and a subdetary and a subdetary approximate and approximate



### Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to environmental indicators that are within scope for Danske Invest's principal adverse impact monitoring and reporting

Climate and other environmental-related indicators

- Indicator 1. GHG emissions
- Indicator 2. Carbon footprint
- Indicator 3. GHG intensity of investee companies
- Indicator 4. Exposure to companies active in the fossil fuel sector
- Indicator 5. Share of non-renewable energy
- Indicator 6. Energy consumption intensity per high impact climate sector
- Indicator 7. Activities negatively affecting biodiversity-sensitive areas
- Indicator 8. Emissions to water
- Indicator 9. Hazardous waste ratio
- Indicator 19. Investments in companies without carbon reduction initiatives

Number of identified engagement interactions related to climate and other environmental-related indicators





### Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to social and employee matters indicators that are within scope for Danske Invest's principal adverse impact monitoring and reporting

# Social and employee, respect for human rights, anti-corruption and anti-bribery matters

- Indicator 10. Violations of UN Global Compact (UNGC) principles and OECD Guidelines for Multinational Enterprises (OECD MNE)
- Indicator 11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD MNE
- Indicator 12. Unadjusted gender pay gap
- Indicator 13. Board gender diversity
- Indicator 14. Exposure to controversial weapons
- Indicator 20. Insufficient whistleblower protection
- Indicator 21. Lack of a human rights policy

# Number of identified engagement interactions related to social and employee, respect for human rights, anti-corruption and anti-bribery matters



# Part 2 Voting

### Introduction to Voting



The general meetings of companies are an opportunity to vote on issues of key importance, and contribute to the good governance of the company. Voting is sought on all shares held, under both passive and active strategies, while taking into account preconditions, resources, and the costs of exercising voting rights.

 In adherence with our Active Ownership Policy, Danske's Voting
Guidelines provide a guide of how Danske Bank Asset Management anticipates voting on a given agenda item. The Guidelines are reviewed and updated on an annual basis to reflect market developments and to ensure that Danske's commitments are duly integrated. As enshrined in Danske Invest's Active Ownership Policy, voting must always be carried out in line with an assessment of what serves our investors best.



Voting records are made publicly available on our website.



#### The breadth of voting activities in 2024 are represented below





#### Top 10 industries most voted

Number of companies per industry (Sector in bracket)





### Top 10 and voting distribution across countries

In 2024 voting was carried out at the general meetings of 920 companies that were domiciled across 44 countries. The table provides insights on the top country domiciles.

Country	Count of Companies
United States	492
Japan	63
India	44
Finland	41
China	30
United Kingdom	30
Cayman Islands	27
Switzerland	21
Sweden	17
Poland	16
	United States Japan India India Finland China United Kingdom Cayman Islands Switzerland Sweden



### Most common Environmental & Social categorised proposal items voted 'For'

#### **Observed Trends**

Of the 13,465 tabled proposal items voted on in 2024, approximately 2,9% (389) were categorized as environmental & social by our proxy provider. These included proposals filed by shareholder proponents that are not supportive of the integration of environmental and social considerations by businesses (also referenced as anti-ESG proponents).

This notwithstanding the most common themes amongst these remained stable, with management proposals related to the approval of donations and non-financial information statements being the most prevalent. Climate-related proposals from shareholders were also common, often requesting increased disclosure and greenhouse gas emissions improvements. There was a rise in attention to biodiversity, climate and social issues. Biodiversity became a key concern, with proposals on responsible sourcing and construction near sensitive areas gaining traction. Climate initiatives expanded beyond oil and gas to industries such as steel and automotive, with increased scrutiny on corporate lobbying.

Social issues like living wages and freedom of association appeared more frequently on meeting agendas across companies, reflecting the systemic concerns being raised. Additionally, AI governance emerged as topic for boards to consider, urging companies to be transparent about risks related to its use.





### In 2024, we have voted in support of proposals linked to Principal Adverse Impact Indicators

Supported proposals that have been identified in relation to the PAIs, which are within Danske Invest's scope for monitoring and reporting<sup>1</sup>



### More information on our voting activities?

#### View our votes

On our voting platform, we continuously disclose how we vote at the general meetings of holdings of significance

#### View our active ownership policy

Our active ownership policy sets out the principles guiding our voting scope through which we identify holdings of significance to vote on

#### View Danske's voting guidelines

The voting guidelines sets out a number of principles that guide the votes cast at general meetings

#### Voting explained

Danske Invest uses our voting rights to voice our opinion at the general meetings of companies we invest in. Through the delegation of the exercise of voting rights to Danske Bank Asset Management, who votes either for or against proposals with the purpose of supporting companies in long-term value creation, the mitigation of sustainability-related risks and minimization of adverse impacts on society.

Danske Invest seeks to vote for all shares held. However, voting activities may be constrained by preconditions, resources, and the costs of exercising voting rights. This notwithstanding, through the application of our voting scope we have identified the holdings of significance that we will always seek to vote on.

Voting is done on a variety of management and shareholder resolutions, of which the majority targets corporate governance issues required under local listing requirements. As a guide for our voting activities and demonstration of transparency of our anticipated voting behaviour in the coming voting season Danske has developed Voting Guidelines. The Guidelines are maintained and updated on an annual basis.

Our proxy advisor supports us with

- Notices of general meetings and comprehensive information about the companies, the voting items on the agenda and voting recommendations,
- Voting recommendations based upon the Danske's Voting Guidelines.

Voting is also conducted on proposals not specifically addressed by the Voting Guidelines, in which case a proposal's likelihood of enhancing the long-term financial return or profitability of the company or maximizing long-term shareholder value is evaluated.

# Part 3 Collaborative Engagements

### **Collaborative Engagements introduction**



When appropriate, Danske Bank on behalf of Danske Invest, collaborates with peers, like-minded investors and other relevant parties to exercise Active Ownership by engaging through joint dialogue and contributing collectively in respect to governance and sustainability dimensions. It might be appropriate to raise the issue with others in instances where individual engagement may have proven to be unsuccessful.



Through Danske Bank, Danske Invest participates in investor initiatives to encourage increased transparency and sustainability standards in companies and financial markets.



Cooperating with other stakeholders is not subject to any frequency targets and can be done on an ad-hoc basis or through formal investor networks or membership forums. Danske's in collaborative engagements is undertaken with respect to and compliance of applicable competition laws, and Danske Bank's internal policies and guidelines relating to this.



Further information on our approach and governance of participation in collaborative initiatives is available in our Active Ownership Policy.



Read more about the collaborative initiatives that we have joined

**Find information** 





#### Overview of involvement in Climate Action 100+ activities

Climate Action 100+ (CA100+) is considered to be the largest ever global investor engagement initiative on climate change, which is focused on the largest corporate greenhouse gas emitters. Further information is available in the link provided below.<sup>1</sup>



In 2024 Danske Bank Asset Management joined seven collaborative engagements organised under CA100+. In addition, we voted in favour of approximately 50% (29) environmental and social proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.





### Overview of involvement in Institutional Investors Group on Climate Change Net Zero Engagement Initiative

The Net Zero Engagement Initiative (NZEI) is an investor led initiative aimed at aligning investment portfolios with a net zero pathway using corporate engagement. It focuses on major emitters beyond the Climate Action 100+ focus list. Further information is available in the link provided below.<sup>1</sup>





### Overview of involvement in Nature Action 100

Nature Action 100 is a global investor-led engagement initiative focused on supporting greater corporate ambition and action to reverse nature and biodiversity loss. Further information is available in the link provided below.<sup>1</sup>



## Overview of Nature Action 100 Working Groups that we are participating in

Novo Nordisk

Lowe's Companies Inc.

Packaging Corp of America

In 2024 Danske Bank Asset Management participated in three collaborative engagements organised under Nature Action 100. In addition, we voted in favour of approximately 54% (45) of environmental and social categorized proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.





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### Overview of involvement in Principles for Responsible Investment's Advance

Advance is a PRI-led collaborative initiative where institutional investors aim to protect and enhance risk-adjusted returns by advancing progress on human rights through investor stewardship. Further information is available in the link provided below.<sup>1</sup>





### Overview of involvement in FAIRR's collaborative engagement working groups

The FAIRR Initiative (FAIRR) is a collaborative investor network that raises awareness of the material risks and opportunities in the global food sector. Further information is available in the link provided below<sup>1</sup>





#### **Disclaimer & contact information**

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