



Statement on principal adverse impacts of investment decisions on sustainability factors

Skandinaviska Enskilda Banken AB, LEI: F3JS33DEI6XQ4ZBPTN86

Summary

Skandinaviska Enskilda Banken AB (SEB AB) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the statement on principal adverse impacts on sustainability factors of SEB AB and covers the reference period from 1 January 2023 to 31 December 2023. Individual subsidiaries of SEB AB, which act as financial market participants in their own right, disclose statements on the principal adverse impacts of their investment decisions on sustainability factors on a standalone basis. Therefore, their disclosures are not consolidated in the present statement.

SEB AB addresses potential adverse impacts by integrating environmental, social, and governance (ESG) factors into its screening and investment decision-making processes to varying degrees and by adhering to exclusion criteria. Currently, SEB AB is in the process of revising its sustainable investment policy aimed at strengthening its processes for identifying, assessing, and minimizing negative impacts of its investment activities on sustainability-related aspects, while also leveraging opportunities for sustainable growth.

The scope of this statement encompasses SEB AB's discretionary portfolio management offering, including directly owned assets, assets invested by SEB AB in funds managed by SEB Investment Management AB (SEB IM),¹ and assets in external funds. In 2023 SEB AB offered discretionary portfolio management services in Sweden (home market), Finland, Luxembourg, Germany, and Denmark. In line with the reporting requirements, the statement summary is provided in multiple languages reflecting this geographic spread. In 2023, the total value of these assets was around SEK 409.3 billion. As nearly 78 per cent of this amount was allocated to SEB funds or discretionary mandates managed by SEB IM on behalf of SEB AB, we disclose additional information about policies and actions taken by SEB IM in the current statement.

We report on 18 mandatory and two additional principal adverse impact indicators listed in Annex 1 of the Sustainable Finance Disclosure Regulation (SFDR), reflecting the priority focus areas for SEB funds that constitute the core of the bank's discretionary portfolio management offering. The quantitative figures provided are based on the ESG data leveraged from third-party providers and supplemented by additional data collected through SEB IM's own efforts using external digital platforms. The figures are calculated in accordance with official guidance from the European Supervisory Authorities (ESAs). SEB AB also reports on a set of alternative principal adverse impact values specifically calculated in relation only to relevant assets which exclude cash, deposits, derivatives, cash equivalents and other asset types that do not have the principal adverse impact data. We believe these alternative figures provide more accurate representation of the impacts caused by our investments as they focus on relevant categories of exposures and are less influenced by the data availability and coverage.

In addition, this statement details the actions taken or planned to address and minimize these impacts and includes observations from our first historical comparison. The data is still characterised by qualitative and quantitative gaps challenging our ability to conduct a meaningful historical analysis. As materiality assessments mature and the availability and quality of sustainability data improve, we plan to expand the scope of principal adverse impact indicators integrated into our investment decision-making processes in the future.

¹ SEB Investment Management AB (also referred to as the Fund Management Company) is a wholly owned subsidiary of SEB AB.

Sammanfattning

Skandinaviska Enskilda Banken AB (SEB AB) beaktar huvudsakliga negativa konsekvenser av sina investeringsbeslut för hållbarhetsfaktorer. Det här är SEB AB:s redogörelse för sina investeringsbesluts huvudsakliga negativa konsekvenser för hållbarhetsfaktorer. Redogörelsen omfattar referensperioden från 1 januari 2023 till 31 december 2023. SEB AB:s enskilda dotterbolag, som agerar som självständiga finansmarknadsaktörer, utfärdar separata redogörelser för huvudsakliga negativa konsekvenser av sina investeringsbeslut för hållbarhetsfaktorer, och omfattas därför inte av SEB AB:s redogörelse.

SEB AB hanterar potentiella negativa konsekvenser genom att integrera miljö-, sociala - och styrningsfaktorer (ESG) i varierande grad i screening- och investeringsbeslutsprocesser och genom efterlevnad av exkluderingskriterier. SEB AB är i färd med att revidera sin policy för hållbara investeringar, vilken syftar till att stärka våra processer för att identifiera, bedöma och minimera negativa konsekvenser för hållbarhetsrelaterade aspekter som orsakas av våra investeringsaktiviteter, och samtidigt utnyttja möjligheter till hållbar tillväxt.

Denna redogörelse omfattar SEB AB:s diskretionära portföljförvaltningserbjudande, inklusive direktägda tillgångar, tillgångar investerade av SEB AB i fonder förvaltade av SEB Investment Management AB (SEB IM)² samt tillgångar i externa fonder. Under 2023 erbjöd SEB AB diskretionära portföljförvaltningstjänster i Sverige (hemmamarknaden), Finland, Luxemburg, Tyskland och Danmark, varför sammanfattning av redogörelsen presenteras på de språk som speglar denna geografiska spridning. År 2023 uppgick det totala värdet av dessa tillgångar till cirka 409,3 miljarder kronor. Då nästan 78 procent av denna summa allokaterats till SEB-fonder eller diskretionära mandat som förvaltas av SEB IM på uppdrag av SEB AB, presenteras även information om SEB IM:s policyer och vidtagna åtgärder i denna redogörelse.

SEB AB's redogörelse omfattar de 18 obligatoriska - samt ytterligare två indikatorer för de huvudsakliga negativa konsekvenser som anges i Bilaga 1 till förordningen om hållbarhetsrelaterade upplysningar (SFDR), vilka återspeglar prioriterade fokusområden för SEB-fonder som utgör huvuddelen av den diskretionära portföljförvaltningen som erbjuds av banken. De kvantitativa siffrorna som rapporteras är baserade på ESG data från tredjepartsleverantörer, kompletterat med data insamlade av SEB IM via externa digitala plattformar. Siffrorna beräknas i enlighet med officiell vägledning från Europeiska tillsynsmyndigheterna (ESAs). SEB AB rapporterar även alternativa värden som beräknas i relation till relevanta tillgångar, vilka exkluderar kassa och andra likvida medel, inlåning (deposits), derivat och andra tillgångar vilka saknar specifika data om huvudsakliga negativa konsekvenser. Vi menar att dessa alternativa värden ger en mer rättvisande bild av de konsekvenser våra investeringar medför eftersom de avser mer relevanta kategorier av exponeringar och därmed är mindre påverkade av tillgång till data och täckningsgrad.

Redogörelsen beskriver också åtgärder som vidtagits eller planeras att vidtas för att hantera och minimera dessa negativa konsekvenser, samt inkluderar jämförelser med uppgifter för år 2022. Tillgängliga hållbarhetsrelaterad data har både kvalitativa och kvantitativa brister vilket medför svårigheter att utföra meningsfull analys av jämförelsedata. I takt med att data för indikatorerna mognar och tillgången till och kvaliteten på hållbarhetsrelaterade data förbättras, planerar vi att utöka antalet indikatorer för de huvudsakliga negativa konsekvenserna i våra investeringsbeslutsprocesser.

² SEB Investment Management AB är ett helägt dotterbolag till SEB AB.

Sammenfatning

Skandinaviska Enskilda Banken AB (SEB AB) tager hensyn til væsentlige negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer. Denne erklæring om de væsentlige negative indvirkninger på bæredygtighedsfaktorer omfatter referenceperioden fra den 1. januar 2023 til den 31. december 2023. Individuelle datterselskaber til SEB AB, som selvstændigt fungerer som finansielle markedsdeltagere, offentliggør erklæringer om væsentlige negative indvirkninger af deres investeringsbeslutninger på bæredygtighedsfaktorer på selvstændig basis og er derfor ikke medtaget i SEB AB's erklæring.

SEB AB adresserer potentielle negative indvirkninger ved at integrere miljømæssige, sociale og ledelsesmæssige (ESG) faktorer i sine screening- og investeringsbeslutningsprocesser i varierende grad samt ved at følge eksklusionskriterier. I øjeblikket er SEB AB ved at revidere sin politik for bæredygtige investeringer som har til formål at forbedre vores processer til at identificere, vurdere samt minimere negative indvirkninger af vores investeringsaktiviteter på bæredygtighedsrelaterede aspekter, samtidig med at vi udnytter mulighederne for bæredygtig vækst.

Denne erklæring dækker SEB AB's diskretionære porteføljevaltning, som omfatter direkte ejede aktiver, aktiver investeret af SEB AB i fonde forvaltet af SEB Investment Management AB (SEB IM)³ og i eksterne fonde. I 2023 tilbød SEB AB diskretionær porteføljevaltning i Sverige (hjemmemarkedet), Finland, Luxembourg, Tyskland og Danmark. I overensstemmelse med rapporteringskravene er redegørelsen udarbejdet på flere sprog for at afspejle denne geografiske spredning. I 2023 var den samlede værdi af disse aktiver omkring 409,3 milliarder SEK. Da næsten 78 % af dette beløb blev allokert til enten SEB-fonde eller til diskretionære mandater, hvor forvaltningen var delegeret videre af SEB AB til SEB IM, rapporterer vi yderligere oplysninger om politikker og tiltag foretaget af SEB IM i den aktuelle erklæring.

Vi rapporterer på 18 obligatoriske samt to yderligere indikatorer for væsentlige negative indvirkninger, der er opført i bilag 1 til forordningen om bæredygtighedsrelaterede oplysninger (SFDR), der afspejler prioriterede fokusområder for de SEB fonde, der udgør kernen i bankens diskretionære porteføljevaltning ydelser. De kvantitative datapunkter i rapporteringen er baseret på ESG data fra tredjepartsudbydere og suppleret med yderligere data indsamlet gennem SEB IM's egen indsats ved hjælp af eksterne digitale platforme. Datapunkterne for de væsentlige negative indvirkninger er beregnet i overensstemmelse med de officielle retningslinjer fra de europæiske tilsynsmyndigheder (ESAs). SEB AB rapporterer også på en række alternative datapunkter for de primære negative indvirkninger, der er beregnet specifikt i forhold til relevante aktiver. Disse inkluderer kun relevante aktiver og er eksklusiv kontanter, indskud, derivater, likvide aktiver og andre aktiver, der ikke har specifikke data for væsentlige negative påvirkninger. Vi mener, at disse alternative datapunkter angiver en mere nøjagtig repræsentation af indvirkninger forårsaget af vores investeringer, da de fokuserer på relevante kategorier af eksponeringer og er i mindre grad påvirket af data tilgængelighed og datadækning.

Derudover beskriver rapporten de foranstaltninger, der er truffet eller planlagt for at håndtere og minimere disse indvirkninger, og indeholder observationer fra vores første historiske sammenligning. Data er stadig præget af kvalitative og kvantitative mangler, der udfordrer vores evne til at foretage en meningsfuld historisk analyse. I takt med at væsentlighedsvurderinger modnes, og tilgængeligheden og kvaliteten af bæredygtighedsdata forbedres, planlægger vi at udvide omfanget af væsentlige negative indvirkninger, der er integreret i vores investeringsbeslutningsprocesser i fremtiden.

³ SEB Investment Management AB er et fuldt ejet datterselskab af SEB AB.

Zusammenfassung

Die **Skandinaviska Enskilda Banken AB** (SEB AB) berücksichtigt die wichtigsten nachteiligen Auswirkungen ihrer Investitionsentscheidungen in Bezug auf Nachhaltigkeitsfaktoren. Bei der vorliegenden Mitteilung handelt es sich um die Erklärung zu den wichtigsten nachteiligen Auswirkungen in Bezug auf die Nachhaltigkeitsfaktoren der SEB AB für den Referenzzeitraum vom 1. Januar 2023 bis 31. Dezember 2023. Tochtergesellschaften der SEB AB, die als rechtlich eigenständige Finanzmarktteilnehmer handeln, veröffentlichen ihre Erklärungen über die Berücksichtigung der wichtigsten nachteiligen Auswirkungen ihrer Investitionsentscheidungen in Bezug auf Nachhaltigkeitsfaktoren jeweils einzeln und sind daher nicht durch die Erklärung der SEB AB abgedeckt.

Die SEB AB berücksichtigt potenzielle negative Auswirkungen, indem sie Umwelt-, Sozial- und Governance-Faktoren (Environmental, Social, Governance, ESG) in unterschiedlichem Maß in ihre Screening- und Anlageentscheidungsprozesse integriert und Ausschlusskriterien beachtet. Derzeit überarbeitet die SEB AB ihre nachhaltige Investitionspolitik mit dem Ziel, die Prozesse zur Identifizierung, Bewertung und Minimierung negativer Auswirkungen der Investitionstätigkeit auf nachhaltigkeitsbezogene Aspekte zu verbessern und gleichzeitig Chancen für nachhaltiges Wachstum zu nutzen.

Der Geltungsbereich dieser Erklärung umfasst das diskretionäre Portfoliomanagement-Angebot der SEB AB, einschließlich der direkt gehaltenen Vermögenswerte sowie von der SEB AB in Fonds investierte Vermögenswerte, die von der SEB Investment Management AB (SEB IM)⁴ verwaltet werden, und Anlagen in externe Fonds. Im Jahr 2023 bot die SEB AB diskretionäre Portfoliomanagement-Services in Schweden (Heimatmarkt), Finnland, Luxemburg, Deutschland und Dänemark an. Im Einklang mit den Berichtsanforderungen wird die Zusammenfassung der Erklärung in mehreren Sprachen vorgelegt, um diese geografische Verteilung widerzuspiegeln. Im Jahr 2023 belief sich der Gesamtwert dieser Vermögenswerte auf rund 409,3 Milliarden SEK. Da rund 78 Prozent dieses Betrags SEB Fonds oder diskretionären Mandaten zugeordnet wurden, die von der SEB IM im Auftrag der SEB AB verwaltet wurden, veröffentlicht die SEB AB in der aktuellen Erklärung zusätzliche Informationen zu den von der SEB IM ergriffenen Richtlinien und Maßnahmen. Die SEB AB berichtet über 18 obligatorische und zwei zusätzliche Hauptindikatoren für negative Auswirkungen (in Anhang 1 der Verordnung über nachhaltigkeitsbezogene Offenlegungspflichten im Finanzdienstleistungssektor (SFDR) aufgeführt), die die vorrangigen Schwerpunktbereiche der SEB Fonds widerspiegeln. Sie bilden den Kern des diskretionären Portfoliomanagement-Angebots der Bank. Die angegebenen quantitativen Zahlen basieren auf Daten, die von Drittanbietern zur Verfügung gestellt und durch zusätzliche Daten ergänzt wurden, die durch eigene Bemühungen von der SEB IM selbst über externe digitale Plattformen gesammelt wurden. Die Zahlen zu den wichtigsten negativen Auswirkungen wurden in Übereinstimmung mit den offiziellen Leitlinien der europäischen Aufsichtsbehörden (European Supervisory Authorities) berechnet. Die SEB AB berichtet zudem über eine Reihe alternativer Werte der wichtigsten negativen Auswirkungen, die speziell in Bezug auf die relevanten Vermögenswerte berechnet wurden, und die Bargeld, Einlagen, Derivate, Zahlungsmitteläquivalente und andere Vermögensarten ausschließen, für die keine spezifischen Daten zu den wichtigsten negativen Auswirkungen vorliegen. Die SEB AB ist der Ansicht, dass diese alternativen Zahlen eine genauere Darstellung der durch die Investitionen der Bank verursachten Auswirkungen bieten, da sie sich auf relevante Kategorien von Engagements konzentrieren und weniger durch die Datenverfügbarkeit und die Datenabdeckung beeinflusst sind.

Darüber hinaus beschreibt der Bericht die ergriffenen oder geplanten Maßnahmen zur Bewältigung und Minimierung dieser Auswirkungen und enthält Erkenntnisse aus dem ersten historischen Vergleich. Die Daten weisen noch immer qualitative und quantitative Lücken auf, die es der SEB AB erschweren, eine aussagekräftige historische Analyse durchzuführen. Mit zunehmender Reife der Wesentlichkeitsbewertungen und der Verbesserung der Verfügbarkeit und Qualität von Nachhaltigkeitsdaten plant die SEB AB, den Umfang der wichtigsten Indikatoren für negative Auswirkungen, die in die Anlageentscheidungsprozesse der SEB AB einfließen, in Zukunft zu erweitern.

⁴SEB Investment Management AB ist eine 100%ige Tochtergesellschaft der SEB AB.

Résumé

Skandinaviska Enskilda Banken AB (SEB AB) prend en compte les principaux effets négatifs de ses décisions d'investissement sur les facteurs de durabilité. La présente déclaration est la déclaration sur les principaux effets négatifs des facteurs de durabilité de SEB AB et couvre la période de référence allant du 1er janvier 2023 au 31 décembre 2023. Les filiales de SEB AB qui agissent en tant qu'acteurs à part entière du marché financier publient des déclarations sur les principaux effets négatifs de leurs décisions d'investissement sur les facteurs de durabilité sur une base autonome, et ne sont donc pas consolidées dans la déclaration de SEB AB.

SEB AB aborde les potentiels effets négatifs en intégrant les facteurs environnementaux, sociaux et de gouvernance (ESG) à des degrés divers dans ses processus de sélection et de prise de décision en matière d'investissement, ainsi qu'en adhérant aux critères d'exclusion. SEB AB est en train de réviser sa politique d'investissement durable qui vise à améliorer d'identification, d'évaluation et de minimisation des principaux effets négatifs de nos activités d'investissement sur les aspects liés à la durabilité, tout en tirant parti des opportunités de croissance durable.

Cette déclaration couvre la gestion discrétionnaire de portefeuille qui inclut les actifs propres, les actifs investis par SEB AB en fonds gérés par SEB Investment Management AB (SEB IM)⁵ et en fonds d'investissements externes. En 2023, l'offre de gestion de portefeuille de SEB AB était disponible en Suède (marché domestique), en Finlande, au Luxembourg, en Allemagne et au Danemark. Conformément aux exigences en matière de reporting, le résumé de la déclaration est fourni en plusieurs langues, reflétant cette couverture géographique. En 2023, la valeur totale de ces actifs s'élevait à environ 409.3 milliards de SEK. Près de 78 % de ce montant étaient alloués soit à des fonds SEB, soit à des mandats discrétionnaires dont la gestion était subdéléguée par SEB AB à SEB IM. Nous incluons donc des informations supplémentaires sur les politiques et actions entreprises par SEB IM dans la présente déclaration.

SEB AB rend compte de 18 indicateurs principaux obligatoires d'impact négatif et de deux indicateurs supplémentaires énumérées à l'Annexe 1 du Règlement sur la publication d'informations en matière de durabilité financière (SFDR), reflétant les domaines d'actions prioritaires pour les fonds qui constituent le noyau de la gestion discrétionnaire de portefeuille proposée par la banque. Les chiffres quantitatifs fournis sont basés sur les données obtenues auprès de fournisseurs tiers et complétées par des données supplémentaires collectées par les propres efforts de SEB IM à l'aide de plateformes numériques externes. Les chiffres sont calculés conformément aux directives officielles des Autorités Européennes de Surveillance (AES). SEB AB rapporte également un ensemble de valeurs alternatives d'impact négatif principal spécifiquement calculées en relation avec les actifs concernés, qui excluent les liquidités, les dépôts, les produits dérivés, les équivalents de trésorerie et autres types d'actifs ne disposant pas de données spécifiques sur les principaux impacts négatifs. Nous croyons que ces chiffres alternatifs offrent une représentation plus précise des impacts causés par nos investissements, car ils se concentrent sur les catégories d'expositions pertinentes et sont moins influencés par la disponibilité et la couverture des données.

En outre, Le rapport détaille les actions entreprises ou prévues pour aborder et minimiser ces impacts et inclut des observations de notre première comparaison historique. Les données sont encore caractérisées par des lacunes qualitatives et quantitatives qui rendent difficile notre capacité à réaliser une analyse historique significative. À mesure que les évaluations de matérialité mûrissent et que la disponibilité et la qualité des données sur la durabilité s'améliorent, nous prévoyons d'élargir la portée des indicateurs des principaux effets négatifs intégrés dans nos processus de prise de décision en matière d'investissement.

⁵ SEB Investment Management AB (SEB IM) est une filiale à 100 % de SEB AB.

Tiivistelmä

Skandinaviska Enskilda Banken AB (SEB AB) ottaa huomioon sijoituspäätöstensä pääasialliset haitalliset vaikutukset kestävyystekijöihin. Tämä ilmoitus on SEB AB:n ilmoitus pääasiallisista haitallisista vaikutuksista kestävyystekijöihin ja kattaa vertailuajanjakson 1.1.2023–31.12.2023. SEB AB:n tytäryhtiöt, jotka toimivat itsenäisinä finanssimarkkinatoimijoina, julkaisevat ilmoitukset sijoituspäätöstensä pääasiallisista haitallisista vaikutuksista itsenäisesti. Näin ollen kyseisiä tietoja ei ole konsolidoitu tähän ilmoitukseen.

SEB AB puuttuu mahdollisiin haitallisiin vaikutuksiin integroimalla vaihtelevassa määrin ympäristöön, yhteiskuntaan ja hyvään hallintotapaan (ESG) liittyvät tekijät prosesseihinsa koskien sijoituksia koskevaa päätöksentekoa ja seurantaa sekä noudattamalla poissulkukriteerejä. SEB AB uudistaa parhaillaan vastuullisen sijoittamisen politiikkaansa, jonka tavoitteena on kehittää prosesseja, joilla tunnustetaan, arvioidaan ja minimoidaan sijoitustoiminnan negatiiviset vaikutukset kestävyteen liittyviin näkökohtiin sekä hyödynnetään mahdollisuuksia kestävään kasvuun.

Tämä ilmoitus kattaa SEB AB:n täyden valtakirjan omaisuudenhoidon, mukaan lukien suoraan omistetut varat, SEB AB:n SEB Investment Management AB:n (SEB IM)⁶ hallinnoimiin rahastoihin sijoittamat varat ja ulkopuolisiin rahastoihin sijoitetut varat. Vuonna 2023 SEB AB tarjosi täyden valtakirjan omaisuudenhoitopalveluja Ruotsissa (kotimarkkina), Suomessa, Luxemburgissa, Saksassa ja Tanskassa. Raportointivaatimusten mukaisesti ilmoituksen tiivistelmä toimitetaan useilla kielillä, mikä kuvastaa tätä maantieteellistä jakautumista. Vuonna 2023 näiden varojen kokonaisarvo oli noin 409,3 miljardia Ruotsin kruunua. Koska lähes 78 prosenttia tästä määrästä kohdennettiin SEB:n rahastoihin tai täyden valtakirjan omaisuudenhoidon mandaatteihin, joita SEB IM hallinnoi SEB AB:n puolesta, annamme tässä ilmoituksessa lisätietoa SEB IM:n noudattamista menettelytavoista ja toimista.

Raportoimme 18 pakollisesta ja kahdesta lisäindikaattorista Sustainable Finance Disclosure Regulation (SFDR) -asetuksen liitteessä 1 listatun mukaisesti, heijastaen pankin täyden valtakirjan omaisuudenhoidon ytimen muodostavien SEB-rahastojen keskeisiä painopistealueita. Esitetyt määrälliset luvut perustuvat kolmansien osapuolten ESG-dataan, joita täydennetään SEB IM:n toimesta ulkopuolisilta digitaalisilta alustoilta kerätyillä lisätiedoilla. Luvut on laskettu Euroopan valvontaviranomaisten (ESAt) virallisten ohjeiden mukaisesti. SEB AB raportoi myös vaihtoehtoisia pääasiallisten haitallisten vaikutusten arvoja, jotka on laskettu ainoastaan kyseessä oleville omaisuuserille, joihin eivät kuulu käteisvarat, talletukset, johdannaiset, muut rahavarat sekä muut omaisuuserätyypit, joista ei ole saatavilla tiettyjä pääasiallisia haitallisia vaikutuksia koskevia tietoja. Uskomme, että nämä vaihtoehtoiset luvut antavat tarkemman kuvan sijoitustemme aiheuttamista vaikutuksista, sillä niissä keskitytään kyseessä oleviin vastuisiin, ja ne ovat vähemmän alttiita tietojen saatavuudelle ja kattavuudelle.

Raportissa kuvataan yksityiskohtaisesti toteutetut tai suunnitellut toimenpiteet näiden vaikutusten käsittelemiseksi ja minimoimiseksi ja se sisältää havaintoja ensimmäisestä historiallisesta vertailustamme. Tiedoissa on edelleen laadullisia ja määrällisiä puutteita, mikä aiheuttaa haasteita tarkoituksenmukaisen historiallisen analyysin laatimiselle. Kun olennaisuusarvioinnit kehittyvät ja vastuullisuusdatan saatavuus sekä laatu paranevat, aiomme tulevaisuudessa laajentaa sijoituksia koskeviin päätöksentekoprosesseihin sisällytettävien pääasiallista haitallisuutta kuvaavien kestävyysindikaattoreiden soveltamisalaa.

⁶ SEB Investment Management AB (SEB IM) on SEB AB:n kokonaan omistama tytäryhtiö.

Description of the principal adverse impacts on sustainability factors

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
<i>Indicators applicable to investments in investee companies</i>						
Greenhouse gas emissions	1. GHG emissions <i>(Tonnes of CO₂e)</i>	Scope 1 GHG emissions	344,972.67 Coverage: 63.75 %	429,588.78 Coverage: 63.24 %	Our data analysis indicates that our Scope 1 and Scope 2 GHG emissions have decreased significantly since 2019, when we began excluding fossil fuel companies from our investment portfolio. The comparison of the 2022 and 2023 figures reflects this historical trend characterised by continued exclusions and a growing number of companies in our portfolio adopting GHG reduction targets and taking steps to meet their commitments.	In 2023 SEB Group updated its thematic Environmental Policy and individual sector-specific policies defining its position and approach concerning potential impacts of its business on environment, including climate change. In the policies, SEB outlines its expectations on the companies which include among other things developing a transition plan for Scope 1,2 and 3 emissions in line with the Paris Agreement, increasing carbon storage, as well as developing a plan for transitioning from fossil fuels to renewable energies.
		Scope 2 GHG emissions	101,176.28 Coverage: 63.75 %	114,002.33 Coverage: 63.24 %		
		Scope 3 GHG emissions	9,500,546.09 Coverage: 63.70 %	7,991,877.17 Coverage: 63.24 %		
		Total GHG emissions	9,946,695.04 Coverage: 63.70 %	8,535,468.28 Coverage: 63.24 %		
	2. Carbon footprint <i>(Tonnes CO₂e per million EUR)</i>	Carbon footprint	289.04 Adjusted impact ⁹ : 453.77 Coverage: 63.70 %	208.56 Adjusted impact: 329.80 Coverage: 63.24 %	It is important to note that fully comparing the latest GHG emissions data with historical data is challenging due to differences in data sources and methods used. In previous years, our emissions dataset contained a significant share of modelled and estimated figures, which often carried a degree of uncertainty. Recently, there has been a growing availability of GHG emissions data disclosed by companies. This switch to reported data, which is generally more	SEB AB has not yet set time-bound GHG reduction targets or implemented forward-looking climate scenario analysis for its directly owned assets to the same extent as it has for its credit portfolio and for SEB IM-managed funds. The assets, invested by SEB AB in funds managed by SEB IM, are subject to the latter's GHG reduction targets aiming at reaching net zero emissions by 2040. Climate change and adherence to science-based targets (SBT) is one of the priority areas of active ownership and engagement activities conducted by SEB IM. In 2023 SEB IM conducted 458 dialogues
	3. GHG intensity of investee companies	GHG intensity of investee companies	939.43 Adjusted impact: 1,475.48	596.94 Adjusted impact: 944.40		

⁷ Calculated in relation to the "Current value of all investments", as defined in the official guidance provided by the European Supervisory Authorities (ESAs) in the [Q&A on the SFDR Delegated Regulation](#) as of 17 November 2022. It reflects a total value of investments in scope, including cash, deposits, derivatives and cash equivalents.

⁸ Provides clarification on the proxy data used and observations related to historical comparisons.

⁹ Calculated in relation to the value of relevant assets only which exclude cash, deposits, derivatives, cash equivalents and other asset types for which specific principal adverse impact data is not available. The rationale for disclosing these alternative figures is explained in the "Data sources and methodology" section.

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
	(Tonnes CO ₂ e per million EUR)	Coverage: 63.67 %	Coverage: 63.21 %	<p>reliable, has led to fluctuations in the emissions figures. This trend is also evident in the 2022 and 2023 datasets affecting comparability between the two years.</p> <p>Due to improved data availability, we have observed an opposite trend for Scope 3 emissions within our investment portfolio. Increased transparency in emissions reporting by corporate entities and their improved ability to track GHG emissions across their value chains have led to a rise in our Scope 3 emissions and, consequently, our total emissions, as well as our carbon footprint and intensity.</p>	<p>on climate with 315 companies. In engagement with holding companies, SEB IM addresses and emphasises the importance of:</p> <ul style="list-style-type: none"> • implementing science-based targets and disclosing data on GHG emissions; • adopting a net zero transition plan, including a strategy and investment plan; • considering climate resilience in companies' business models. <p>According to SEB IM's assessment, by late 2023 the Scope 1 and Scope 2 emissions of listed entities in SEB IM-managed funds have been reduced from about 3.4 MtCO₂e to 1.2 MtCO₂e since the baseline year of 2019. This reduction is largely attributed to divestment from fossil fuel and power generation companies. During the same period, the share of investments in companies with approved or committed science-based targets (SBT) has been assessed to increase from 19 per cent to 58 per cent within SEB IM's fund management universe.</p>
4. Exposure to companies active in the fossil fuel sector (%)	Share of investments in companies active in the fossil fuel sector	1.47 Adjusted impact: 2.25 Coverage: 65.25 %	1.43 Adjusted impact: 2.27 Coverage: 63.14 %	<p>The exposure to fossil fuels in 2023 is comparable to the 2022 values. While this indicator remains an exclusion criterion, a small share of fossil fuels is present in the portfolio due to exposures through external funds and a few directly owned holdings assessed by SEB IM as credible transition cases.</p>	<p>The policies of SEB Group generally restrict investments in assets involved in fossil fuels. This includes companies generating energy from fossil fuels. While SEB AB does not perform its own screening for fossil fuels, it draws from the exclusion list of SEB IM that continuously screens its funds' investment universe based on the established policies and criteria.</p>
5. Share of non-renewable energy consumption and production	Share of non-renewable energy production of investee companies from	0.49 Adjusted impact: 0.82 Coverage: 59.71 %	0.39 Adjusted impact: 0.63 Coverage: 62.61 %	<p>The 2023 data used includes energy production from non-renewable sources such as coal, nuclear power, oil, and natural gas. This marks a</p>	<p>Assets, invested by SEB AB in funds managed by SEB IM, are subject to the latter's policies, screening and exclusion processes. As of June 2024, SEB IM excluded 1417 entities involved in fossil fuel production and 1163 entities</p>

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
(%)	non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources			difference from 2022, where we used proxy data that additionally included biomass among these sources. This change also applies to the indicator reflecting the share of non-renewable energy consumption.	involved in fossil fuel distribution and services. According to SEB IM's policies, there are exceptions to exclusions on a case-by-case basis as it aims to support certain companies in their transition journey. SEB IM applies a sector-based approach to best support the change, where it assesses the companies' strategic commitment, operational preparedness and transition trajectory to shift from fossil-based to renewable-based business. By the end of 2023, the total number of active transition cases in SEB-managed funds was 24. SEB IM continuously assesses their decarbonisation performance based on its established methodology. The Fund Management Company collaborates with other investors through initiatives such as Climate Action 100+ and the Net Zero Asset Managers initiative. Furthermore, with the objective of increasing the availability and capacity of renewable energy, SEB IM manages SEB Nordic Energy Fund which invests directly in areas such as geothermal heating, solar power, hydropower and wind power. More information is available in SEB IM's Exclusions and Transition June 2024 report .
	Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to	22.20 Adjusted impact: 57.87 Coverage: 38.37 %	9.82 Adjusted impact: 67.99 Coverage: 14.44 %	The increase in the share of non-renewable energy consumption in 2023 is primarily attributed to the increased availability of reported data for this indicator compared to 2022, as evidenced by changes in the coverage.	The quantitative metrics on the share of non-renewable energy consumption is not considered directly in investment decisions. However, this indicator is indirectly considered by SEB IM in the evaluation of the GHG emissions of its fund holdings. The importance of switching from the use of fossil fuels to renewable sources is also emphasised in engagement dialogues with the investee

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
	renewable energy sources, expressed as a percentage of total energy sources				companies conducted by SEB IM in relation to GHG reduction targets.
6. Energy consumption intensity per high impact climate sector <i>(GWh per million EUR)</i>	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector:			The data availability for this set of indicators remains insufficient for it to be used as standalone criteria in investment decisions or for making any meaningful year-to-year comparisons.	In 2023 and 2024 SEB Group updated several of its sector-specific policies , which refer to the following high-impact climate sectors: <ol style="list-style-type: none"> 1. Forestry; 2. Agriculture, Fishing, Aquaculture; 3. Mining and Metals; 4. Fossil Fuels; 5. Transportation. The policies outline restrictions, requirements and expectations for companies operating in these sectors. These include among other things developing a transition plan for Scope 1,2 and 3 emissions in line with the Paris Agreement, increasing carbon storage, as well as developing a plan for transitioning from fossil fuels to renewable energies. The consideration of these quantitative metrics in investment decisions is pending as the availability and coverage of the data remains limited.
	NACE A <i>(Agriculture, Forestry and Fishing)</i>	0.00001	0.000008		
		Adjusted impact: 0.20	Adjusted impact: 0.27		
		Coverage: 0.005%	Coverage: 0.003 %		
	NACE B <i>(Mining and Quarrying)</i>	0.001	0.001		
		Adjusted impact: 1.00	Adjusted impact: 1.75		
		Coverage: 0.14 %	Coverage: 0.08 %		
	NACE C <i>(Manufacturing)</i>	0.05	0.03		
		Adjusted impact: 0.37	Adjusted impact: 0.48		
		Coverage: 12.54 %	Coverage: 6.70 %		
	NACE D <i>(Electricity, Gas, Steam and Air)</i>	0	0		
		Adjusted impact: 0	Adjusted impact: 0		

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
	<i>Conditioning Supply)</i>	Coverage: 0	Coverage: 0		
	NACE E	0.001	0.0002		
	<i>(Water Supply, Sewerage, Waste Management and Remediation Activities)</i>	Adjusted impact: 1.21	Adjusted impact: 1.35		
		Coverage: 0.04 %	Coverage: 0,01 %		
	NACE F	0.001	0.002		
	<i>(Construction)</i>	Adjusted impact: 0.23	Adjusted impact: 8.23		
		Coverage: 0.29 %	Coverage: 0.03 %		
	NACE G	0.0003	0.0001		
	<i>(Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)</i>	Adjusted impact: 0.07	Adjusted impact: 0.21		
		Coverage: 0.41 %	Coverage: 0.07 %		
	NACE H	0.02	0.005		
	<i>(Transportation and Storage)</i>	Adjusted impact: 3.60	Adjusted impact: 1.39		
		Coverage: 0.51 %	Coverage: 0.33 %		
	NACE L	0	0		
	<i>(Real Estate Activities)</i>	Adjusted impact: 0	Adjusted impact: 0		
		Coverage: 0	Coverage: 0		

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas (%)	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.004 Adjusted impact: 0.01 Coverage: 60.15 %	0.003 Adjusted impact: 0.005 Coverage: 63.13 %	Following the introduction of this indicator as an exclusion criterion in 2022, companies identified to be involved in such activities and not undertaking adequate remediation steps are excluded.	<p>In 2023 SEB Group updated its thematic Environmental Policy as well as individual sector-specific policies outlining its position and approach concerning potential impacts of its business on environment, including biodiversity.</p> <p>SEB IM, which manages SEB funds that constitute a core of discretionary portfolio management offered by SEB AB, also updated its Sustainability Policy in 2023 outlining additional biodiversity-related criteria for exclusion. SEB IM excludes companies that are involved in verified breaches of environmental norms and negatively affect biodiversity-sensitive areas or threatened species. While SEB AB does not perform its own screening, it draws from the exclusion list of SEB IM that continuously screens its funds' investment universe based on the established criteria.</p> <p>SEB IM engages with portfolio companies to encourage full value chain traceability, as well as the development of transparent biodiversity and ecosystem-related strategies, which where possible should adhere to the Taskforce on Nature-related Financial Disclosure (TNFD) framework. It also expects companies to commit to Science-Based Targets for Nature. In 2023 SEB IM became one of 190 investor participants of the global-led initiative Nature 100 that initiated direct engagement dialogues with 100 companies in key sectors around the world with an aim to reverse biodiversity loss by 2030. SEB IM also engages with companies through the collaborative investor network FAIRR and via ISS ESG's pooled engagement service. SEB IM</p>

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
					participated in 187 dialogues on the biodiversity-related topics in 2023. As a member of the TNFD forum, SEB IM collaborates with expert stakeholders to increase the quality and coverage of biodiversity related-data. In addition, it participates in dialogues with governments, public authorities and industry organisations through the Investor Policy Dialogue on Deforestation (IPDD).	
Water	8. Emissions to water <i>(Tonnes per million EUR)</i>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.01 Adjusted impact: 1.11 Coverage: 1.33 %	0.01 Adjusted impact: 0.88 Coverage: 1.29 %	The data availability for this indicator remains limited. Based on the available data pool, the figures have remained comparable between 2022 and 2023. Proxy used: RTS refers to various types of emissions to water, whereas the data used covers one of the types which is chemical oxygen demand (COD), a commonly used indicator measuring emissions to water.	In 2023 SEB Group updated its thematic Environmental Policy and individual sector-specific policies outlining the expectations for the companies operating in certain sectors to measure the amount of discharged wastewater and set their targets for its reuse and recycling. The quantitative metrics concerning emissions to water is not considered as a standalone criterion by SEB AB with regard to the directly owned assets. SEB IM, which manages SEB funds that constitute a core of discretionary portfolio management offered by SEB AB, also updated its Sustainability Policy in 2023 outlining its position on water-related matters. The indicator is considered within the investment process of several funds managed by SEB IM via its proprietary sustainability scoring model SIMS-S.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee	1.96 Adjusted impact: 10.85 Coverage:	8.37 Adjusted impact: 250.18 Coverage:	There have been notable changes between the 2022 and 2023 figures due to the change in the methodological scope of the data used. The 2022 data for this	The quantitative metrics concerning hazardous and radioactive waste is not considered as a standalone criterion by SEB AB with regard to the directly owned assets.

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
	<i>(Tonnes per million EUR)</i>	companies per million EUR invested, expressed as a weighted average	18.06 %	3.34 %	indicator came from a data pool with very limited sector applicability and sector-specific definitions of hazardous and radioactive waste. Companies operating in the metals and mining sectors were disproportionately represented in our 2022 data pool. The data available for 2023 have broader sector applicability and represent the values disclosed by companies based on their own definitions and reporting of hazardous and radioactive waste. This change accounts for the increased data coverage and reduced intensity figures compared to 2022.	This indicator is currently considered within the investment process of several funds managed by SEB IM via its proprietary sustainability scoring model SIMS-S.
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (%)	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.26 Adjusted impact: 0.44 Coverage: 60.15 %	0.28 Adjusted impact: 0.43 Coverage: 63.13 %	Verified violations of international norms serve as grounds for exclusion. The current figures reflect a limited exposure through investments in external funds and a few directly owned holdings. Reported violations linked to direct holdings are thoroughly evaluated by SEB IM based on its Sustainability policy. Based on these evaluations and the information presented, it has been concluded that the companies currently do not meet the criteria for exclusion. The current figures are presented according to the perspective of third-party data providers to promote transparency. Developments will be closely monitored, and appropriate steps	Entities which are involved in verified violations of the international norms and which are failing to take credible remediation action fall under the current exclusion criteria of SEB Group. While SEB AB does not perform its own screening, it draws from the exclusion list of SEB IM that continuously screens its funds' investment universe based on the established policies and criteria. SEB AB extends these exclusions to its directly owned assets. When companies are found to have failed to respect international norms, SEB IM tends to engage in reactive dialogue with these entities. SEB IM often collaborates with other investors and stakeholders in dialogues with companies involved in verified violations. If the company is confirmed to lack the willingness and ability to adequately

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
				will be taken if more evidence emerges.	remediate the violation, it is divested by SEB IM. As of June 2024, SEB IM excluded 86 entities from its funds' management universe over verified violations of the normative frameworks. The exclusions have been extended to SEB AB's directly owned assets or are pending consideration for such an extension.
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (%)	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	7.01 Adjusted impact: 15.38 Coverage: 45.54 %	5.50 Adjusted impact: 11.64 Coverage: 47.23 %	While the 2023 data coverage decreased compared to 2022, the slight increase in the share of companies without policies is assessed to be due to the growing accessibility of more transparent corporate disclosures.	The Social and Human Rights Policy updated by SEB Group in 2023 outlines the expectations for companies to conduct human rights due diligence and embed responsible business conduct into their management systems in line with international norms. This indicator is not considered as a standalone criterion by SEB AB with regard to the directly owned assets at the moment. The indicator is considered within the investment process of several funds managed by SEB IM via its proprietary sustainability scoring model SIMS-S.

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
12. Unadjusted gender pay gap (%)	Average unadjusted gender pay gap of investee companies	0.45 Adjusted impact: 6.50 Coverage: 6.92 %	0.03 Adjusted impact: 1.49 Coverage: 2.19 %	The data coverage for this indicator improved compared to 2022 due to additional data collected through SEB IM's efforts for private equity funds and mandates. This factor accounts for the overall increase in the unadjusted gender pay gap average in 2023.	The Social and Human Rights Policy updated by SEB Group in 2023 outlines gender pay equality as one of the positions on human rights. The indicator is currently considered within the investment process of several funds managed by SEB IM via its proprietary sustainability scoring model SIMS-S. A notable example is the SEB Global Equal Opportunity Fund launched in 2021 with an objective of creating a sustainable positive impact from a gender equality and diversity perspective. It invests in companies that are best in class in these areas.
13. Board gender diversity (%)	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	13.93 Adjusted impact: 37.55 Coverage: 37.11 %	11.10 Adjusted impact: 37.27 Coverage: 29.79 %	The data coverage for this indicator improved compared to 2022 due to additional data collected through SEB IM's efforts for private equity funds and mandates. This factor contributed to the overall increase in the board gender diversity ratio in 2023.	The quantitative metrics on the ratio of female to male board members is not considered as a standalone criterion by SEB AB with regard to the directly owned assets. It is however one of the areas that SEB IM focuses on in its sustainability work. Through its participation in corporate board nomination committees and annual general meetings, SEB IM has been working towards increasing the female representation on the boards to 40 %. In 2023, SEB IM served on 30 nomination committees resulting in an average of 41 % female representation in those companies. The indicator is currently considered within the investment process of several funds managed by SEB IM via its proprietary sustainability scoring model SIMS-S.

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (%)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00005 Adjusted impact: 0.0001 Coverage: 60.17 %	0.00005 Adjusted impact: 0.00008 Coverage: 63.15 %	This indicator remains an exclusion criterion. The marginal exposure to controversial weapons in our portfolio is through investments in external funds.	SEB Group has restrictions on investments in companies producing or developing controversial weapons (anti-personnel mines, biological weapons, chemical weapons, cluster weapons, depleted uranium ammunition) or trading in such weapons or supplying key components for such weapons. Screening against controversial weapons is performed for external funds by SEB AB. While SEB AB does not perform its own screening with regard to the directly owned assets, it draws from the exclusion list of SEB IM that continuously screens its funds' investment universe based on the established policies and criteria. As of June 2024, 267 entities have been excluded by SEB IM over verified involvement in controversial weapons. The exclusions have been extended to SEB AB's directly owned assets or are pending consideration for such an extension.

Indicators applicable to investments in sovereigns and supranationals

Environmental	15. GHG intensity <i>(Tonnes per million EUR)</i>	GHG intensity of investee countries	12.40 Adjusted impact: 233.66 Coverage: 5.31 %	6.73 Adjusted impact: 129.61 Coverage: 5.19 %	The 2023 data includes the emission intensity from production emissions, Scope 2 and Scope 3 per million euros of national GDP. This marks a departure from 2022, where we used proxy data that included only production emissions, which was considered a more traditional approach to accounting for sovereign emissions. This change in methodological scope explains the overall increase in the 2023 figures compared to 2022.	The quantitative metrics on GHG emissions and intensity of sovereign states is currently not considered by SEB AB in its investment decisions. The portfolios within SEB IM mainly invest in Swedish or the United States' sovereign bonds, steered by their investment policies. There is little or no selection between countries for these products, hence there is no action planned for this indicator.
---------------	--	-------------------------------------	--	---	---	---

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
Social	16. Investee countries subject to social violations (%)	Share of investments in investee countries subject to social violations ¹⁰	0.28 Adjusted impact: 5.24 Coverage: 5.31 %	0.42 Adjusted impact: 8.13 Coverage: 5.19 %	<p>The current figures reflect a limited exposure through investments in external funds and a few directly owned holdings.</p> <p>In terms of direct holdings, our exposure to such countries in both 2022 and 2023 is linked to investments in bonds issued by the governments of Poland and the United States. While these countries have been identified as having engaged in social violations, SEB AB lacks formal criteria for evaluating the breaches.</p> <p>Proxy used:</p> <p>The data is based on the ISS ESG's Country Controversy Assessments. States are assessed to be subject to social violations if they are found to violate any of the following areas: human rights, labour rights, child labour, freedom of association, discrimination, death penalty, freedom of speech and the press.</p>	<p>SEB AB has not established formal criteria for evaluating social violations by individual governments and states yet.</p> <p>With regard to funds managed by SEB IM, investments in sovereign bonds issued by countries sanctioned by the United Nations, the European Union, the United States and the United Kingdom are restricted.</p>

¹⁰ Represents the proportion of investments in sovereign bonds issued by the countries subject to social violations in relation to the "Current value of all investments". It is calculated according to the guidance provided by ESAs in the [Final Report on draft Regulatory Technical Standards](#) as of 4 December 2023.

Adverse sustainability indicator	Metric		Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period
<i>Indicators applicable to investments in real estate assets</i>						
Fossil fuels	17. Exposure to fossil fuels through real estate assets (%)	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0 Adjusted impact: 0 Coverage: 8.52 %	0 Adjusted impact: 0 Coverage: 8.07 %	The share of investments in real estate assets involved in fossil fuels remained unchanged at 0 % in both years.	The management of real estate assets has been subdelegated by SEB AB to SEB IM which focuses on establishing client-specific real estate funds. SEB IM aims to invest in real estate properties that are not directly involved in the extraction, storage, transportation, or production of fossil fuels. This guideline applies to both older real estate assets and to more recent and upcoming investments.
Energy efficiency	18. Exposure to energy-inefficient real estate assets (%)	Share of investments in energy-inefficient real estate assets	8.35 Adjusted impact: 98.05 Coverage: 8.52 %	8.00 Adjusted impact: 99.15 Coverage: 8.07 %	There have been no notable changes in our exposure to energy-inefficient assets compared to last year.	The majority of SEB IM's real estate assets, specifically those within the Gamla Tryggliv mandate, consist of relatively old properties, which account for a significant share of energy-inefficient buildings. To address these impacts, SEB IM is developing new real estate funds with the goal of increasing the proportion of energy-efficient properties. All new acquisitions are analyzed from a sustainability perspective, considering factors such as improved energy efficiency and reduced carbon emissions. Examples of these efforts include funds SEB Arkadia Bostad and SEB Nordic Energy, both of which have sustainability-related goals.
<i>Additional indicators</i>						
GHG emissions	Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction	31.11 Adjusted impact: 51.65 Coverage: 60.22 %	34.60 Adjusted impact: 54.77 Coverage: 63.18 %	The data used reflects companies that have not set or have not formally committed to setting carbon reduction targets approved by the SBTi. While the data coverage for 2023 slightly decreased compared to	SEB AB does not consider this indicator with regard to directly owned assets yet. The assets, invested by SEB AB in funds managed by SEB IM, are subject to the latter's GHG reduction targets aiming at reaching net zero emissions by 2040. Climate change and adherence to science-based targets (SBT) is

Adverse sustainability indicator	Metric	Impact 2023 ⁷	Impact 2022	Explanation ⁸	Actions taken, and actions planned and targets set for the next reference period	
	(%)	initiatives aimed at aligning with the Paris Agreement		2022, the figures reflect an overall trend indicating a growing share of companies adopting carbon emission reduction initiatives.	one of the priority areas of active ownership and engagement activities conducted by SEB IM. In engagement with holding companies, SEB IM emphasises the importance of: <ul style="list-style-type: none"> • implementing science-based targets and disclosing data on GHG emissions; • adopting a Net Zero Transition Plan, including a strategy and investment plan; • considering climate resilience in companies' business models. 	
Social and employee matters	Lack of a supplier code of conduct (%)	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	7.79 Adjusted impact: 17.26 Coverage: 45.16 %	7.32 Adjusted impact: 15.51 Coverage: 47.23 %	While the 2023 data coverage decreased compared to 2022, the slight increase in the share of companies without supplier code of conduct is assessed to be due to the growing accessibility of more transparent corporate disclosures.	SEB AB does not consider this indicator with regard to the directly owned assets yet. This indicator reflects one of the current priority areas for the funds managed by SEB IM which aims to ensure that it does not invest in companies involved in violations of international norms through their own operations or supply chains. SEB IM seeks to increase its investments in entities that have established: <ul style="list-style-type: none"> • policies and procedures for human and labour rights; • policies for human rights due diligence and supplier codes of conduct.

Description of policies to identify and prioritise principal adverse impact indicators on sustainability factors

SEB AB's approach towards the consideration of sustainability risks and potential negative impacts in the investment decisions is governed by the policies set out by SEB Group. The 2030 Strategy, adopted by SEB Group in 2021 and integrated in the business plan for 2022-2024, outlines its goals aimed at fostering transition towards a more sustainable society, with sustainable savings and investments identified as one of its key focus areas.

On 18 June 2024, SEB AB adopted [Disclosures on the integration of sustainability risk and consideration of adverse impact on sustainability factors in investment decisions and investment advice](#). The document, which superseded the previous policy established in February 2021, outlines principles for integration of sustainability risks and consideration of adverse impact on sustainability factors in the investment decision-making processes, investment and insurance advice. It draws on the SEB Group's sustainability policy framework which includes:

- [Corporate Sustainability Policy](#) and Corporate Sustainability Governance Instruction which set the overall sustainability framework and provide a governing platform for SEB's sustainability work for all business decisions, including investment decisions. Corporate Sustainability Policy also defines how sustainability-related decisions are integrated in committees, roles and responsibilities.
- Thematic policies focusing on [Environment](#) and [Human Rights](#) which define the principles for identification of risks to natural systems, society and individuals, and outline restrictions on certain high-risk sectors and business relationships.
- Sector policies which provide SEB Group's guidelines and expectations on corporate behaviour, commitment to sector-based standards as well as restrictions on financing and investing in certain activities.

The Board of Directors of SEB AB is responsible for establishing a strategy for corporate sustainability and an organisation to execute this strategy. SEB's sustainability endeavours are an integral part of the business and are regularly included on the Board's agenda, along with an annual review of policies and instructions. The Board approves SEB's strategy and business plan, including sustainability considerations, the Corporate Sustainability Policy and thematic policies. Sector policies are approved by the Board's Risk and Capital Committee. The responsibility over execution of the sustainability strategy and implementation of the governance structure set by the Board lies with the President and Chief Executive Officer, whereas various Committees oversee the adherence to the commitments made. The policies are integrated in the different divisions and subsidiaries and adjusted for their specific areas of activity. Sustainability KPIs are also included in SEB AB's remuneration policy. The policies are reviewed on a regular basis to reflect the continuously evolving nature of the ESG landscape and our growing maturity to leverage sustainability related opportunities and address and mitigate the sustainability risks. More information on the sustainability governance structure and the latest policies are available on SEB Group's [webpage](#).

Discretionary mandates offered at SEB AB are subject to the three-level sustainability framework mentioned above. Asset managers analyse directly owned assets by assessing the entity's involvement in controversial activities and exposure to sustainability risks. SEB AB predominantly relies on sector-based and norm-based restrictions and exclusions to address potential and realised principal adverse impacts. With regard to exclusions, SEB AB predominantly draws from the exclusion list of SEB IM that continuously screens its funds' investment management universe based on its policies and criteria. SEB AB extends these exclusions to directly owned assets.

The assets invested by SEB AB in funds managed by SEB IM, are subject to the latter's own sustainability policies and portfolio management guidelines. SEB IM's [Sustainability Policy](#), [Principles for Shareholder Engagement](#), and [Climate Statement](#) serve as the basis for identification and prioritisation by the Fund Management Company of principal adverse impact indicators for sustainability factors. These principles are updated upon approval by the Board of Directors of the Fund Management Company on at least an annual basis and are available on the Fund Management Company's [webpage](#). Assets in SEB funds are managed through a strategy involving sustainability analysis, active ownership/engagement and exclusion. SEB IM's sustainability analysis relies on its internally developed rating model SIMS-S based on data from multiple sources assessing the companies' ability to address and mitigate sustainability risks, manage materialised negative impacts and develop sustainable solutions. Companies that fail to respect international norms and standards or which are involved in activities and sectors negatively impacting people and environment are excluded. More information on how SEB IM identifies and manages principal adverse impacts in investment decisions is available in its standalone Statement on principal adverse impacts of investment decisions on sustainability factors.

External funds within SEB AB's discretionary portfolio are selected following a due diligence process through a risk-based approach which may include an extended qualitative analysis depending on the risk level. SEB AB also screens external funds for their adherence to SEB Group's exclusion criteria concerning controversial weapons and thermal coal. While SEB's sustainability policies do not cover external providers, being a signatory of the UN-supported Principles for Responsible Investments (PRI) is a minimum requirement that needs to be met by them. SEB AB is exploring options for integrating additional principal adverse impacts in decisions related to investments in external funds in the future.

In addition to addressing and minimising principal adverse impacts, SEB AB also relies on positive screening criteria to invest in companies that offer sustainable solutions and contribute positively to the environment and society.

Engagement policies

As SEB IM manages the majority of SEB AB's client assets either in funds or subdelegated mandates, most of engagement activities are conducted by SEB IM. Based on its established processes, SEB IM exercises active ownership and engages with entities included in SEB funds which constitute a core of discretionary portfolio management offered by SEB AB.

SEB IM engages with companies through a combination of targeted in-house-led dialogues, partner-led engagement services and collaborative initiatives. Engagement activities conducted by SEB IM are governed by its [Principles for Shareholder Engagement](#) adopted by the Board of Directors of the Fund Management Company. The application of these principles is particularly crucial for companies in which SEB IM holds a significant ownership stake and which are deemed essential for the investment portfolio's performance. Considering these priorities, the Fund Management Company focuses its active ownership and engagement efforts primarily on the Swedish and Nordic markets. Furthermore, it directs its engagement activities towards companies undergoing transitions or where proactive dialogue could lead to potentially high impacts. Regarding significant Nordic holdings, the SEB IM actively exercises ownership by addressing various topics, including the sustainability performance of these companies. SEB IM participates in annual general meetings (AGMs) and exercises SEB funds' voting rights. The company may propose or take positions on AGM resolutions that align with targets based on scientifically proven models (such as Science Based Targets), transparency concerning sustainability risks and performance, and ESG incentives in executive compensation.

While SEB IM manages engagement with Nordic companies included in SEB funds, engagement for equities outside the home region is coordinated through recognized engagement partners of the Fund Management Company. SEB IM collaborates with EOS at Federated Hermes, which maintains ongoing dialogue with corporate managements and boards of investees on behalf of investors beyond the Nordic region. ISS ESG serves as another engagement partner for pooled engagement and continuous screening of the SEB funds' investment management universe based on SEB IM's policies and exclusion criteria. Managing adverse impact indicators related to sustainability factors is a primary focus of these dialogues.

SEB IM has identified seven engagement themes as key areas for dialogues with its investees and holdings, whether led internally or by partners:

- Environment: Climate change (Net zero transition plans, science-based targets), biodiversity, clean water
- Social responsibility: healthy societies, supply chain management
- Governance: Executive remuneration (incl. sustainable incentives), Board effectiveness

In cases where engagement dialogues and escalation measures fail to yield the expected outcomes within a reasonable timeframe, SEB IM considers divestment. The decision to divest depends on the company's responsiveness to the escalation and remediation measures taken to address the impacts. Another instance of SEB IM's engagement activities beyond the Nordic region involves its collaboration with Investors Group on Climate Change (IIGCC), Principles for Responsible Investments (PRI), and CDP Water. Collaboration with other investors provides a greater leverage for influencing companies in their sustainability initiatives.

In 2023 SEB IM engaged in 2,837 company dialogues either directly or through collaborative initiatives, voted at 793 annual general meetings and served on 30 nomination committees. As a member of the Net Zero Asset Managers initiative, SEB IM committed to engaging with the top 20 greenhouse gas emitters in its investment holdings. Another area that it focused on in recent years is gender representation on corporate boards of directors, where the goal is to increase female ratio to at least 40 %. In 2023 SEB IM achieved an average of 41 % female representation in the companies for which it served on nomination committees. Another initiative undertaken by SEB IM since 2022 has been to encourage its 100 largest holdings listed on the Nasdaq Stockholm to integrate sustainability targets into their remuneration schemes for senior management. This engagement continued through 2023, leading up to the 2024 AGMs.

References to international standards

In its sustainability work SEB Group is guided by international frameworks which set the standards and expectations for responsible business conduct. SEB AB recognizes the importance of supporting and adhering to international commitments to facilitate the climate transition and meet the UN Sustainable Development Goals (SDGs). SEB AB supports the following international frameworks:

- The Paris Agreement
- The Universal Declaration of Human Rights
- The ILO Core Conventions on Labour Standards
- The UN Guiding Principles on Business and Human Rights
- The Children's Rights and Business Principles
- The OECD Guidelines for Multinational Enterprises

SEB AB is a member or signatory of:

- UN Global Compact
- UNEPFI – Principles for Responsible Banking
- UN-supported Principles for Responsible Investments (PRI)
- Task Force on Climate-related Financial Disclosures (TCFD)

In addition, SEB IM is a member or signatory of:

- The Net Zero Asset Managers Initiative
- Taskforce on Nature-related Financial Disclosures (TNFD) Forum.

SEB AB's commitment to respect these international agreements and frameworks has been embedded in SEB Group's Sustainability Policy. Its adherence to these standards is measured through several principal adverse impact indicators. For instance, SEB AB assesses its investments against criteria such as "Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises" (indicator 10), drawing on screening processes and exclusion lists managed by SEB IM. The latter leverages the data from ISS ESG which identifies corporate controversies and assesses remediation measures taken by the companies based on expectations set forth in these normative frameworks. The research process is incident-driven and relies on reported stakeholder allegations and verification from the relevant state or international authoritative bodies.

Performance against time-bound GHG reduction targets, set by SEB IM in its commitment to the Paris Agreement, TCFD and the Net Zero Asset Managers Initiative, is tracked using climate-related indicators (indicator 1-5). These include metrics related to GHG emissions, involvement in fossil fuels, energy production and consumption as well as an additional indicator titled "Investments in companies without carbon emission reduction initiatives". SEB IM uses GHG emissions data and forward-looking climate scenarios from ISS ESG to track its progress.

As a member of the TNFD Forum, SEB IM collaborates with stakeholders to enhance biodiversity-related data quality and coverage. SEB IM engages with portfolio companies to ensure full value chain traceability and the development of transparent biodiversity and ecosystem strategies, adhering to the TNFD framework and setting expectations for companies to commit to Science-Based Targets for Nature. Currently, it uses the Norm-based research data from ISS EGS to avoid investments in "Activities negatively affecting biodiversity-sensitive areas" (indicator 7) in its fund management universe.

Data sources and methodology

In line with the regulatory requirements, SEB AB discloses quantitative figures on principal adverse impacts reflecting the reference period from 1 January 2023 to 31 December 2023. We continue to report on 18 mandatory and two additional principal adverse impact indicators. The latter two concern our investments in companies without carbon emission reduction initiatives and companies lacking supplier code of conduct. These additional indicators are assessed to be key factors associated with the long-term sustainability goals and reflect priority areas for SEB IM-managed funds which form a core of SEB AB's discretionary portfolio management offering.

SEB AB leverages corporate and sovereign sustainability data from ISS ESG, a responsible investment arm of Institutional Shareholder Services Inc. which is one of the leading providers of corporate governance and responsible investment solutions. Data on principal adverse impacts linked to real estate assets is provided by Novier and Riksbyggen, external management organisations that offer professional advice in sustainability for real estate companies. Additional data has been collected by SEB IM from unlisted entities included in several global and Swedish private equity funds using third-party digital tools such as eFront and Worldfavor. The latter is an online reporting platform in which SEB IM-managed fund Private Equity Nordic Direct II invested in 2022 to address the ESG data deficiency regarding unlisted entities.

We reviewed the data from the providers and assessed that the majority of the datapoints selected align with the required metrics outlined in the Regulatory Technical Standards (RTS) issued by the European Supervisory Authorities (ESAs) in support of SFDR. With regard to a number of other principal adverse impact indicators, we used proxy indicators made available by our data vendors in the absence of fully aligned data. The column "Explanation" in the Table 1 contains information about the proxies used and our observations pertaining to how these impacts compare between two consecutive reporting years.

The annual impact figures for the reference year of 2023 are calculated as four-point averages of quarterly impact figures corresponding to the following dates: 31 March, 30 June, 30 September and 31 December 2023. The qualitative data measuring principal adverse impacts is the most recently available data, often dated as of the previous year-end or a year preceding that. With regard to the data on enterprise value including cash (EVIC) which constitutes a core of calculations for a number of PAI indicators, SEB AB uses the year-end EVIC figures.

In the current statement, SEB AB continues disclosing two alternative sets of principal adverse impact figures. The primary "Impact" values reflect principal adverse impact figures calculated in relation to the "Current value of all investments", as defined in the official guidance provided by ESAs [in the Questions and answers \(Q&A\) on the SFDR Delegated Regulation](#) as of 17 November 2022. It includes the total value of stocks, bonds, investments in funds and real estate, deposits, derivatives, cash and equivalents. In addition, SEB AB reports alternative principal adverse impact figures as "Adjusted Impact" values. These are calculated in relation to the value of relevant assets only which exclude cash, deposits, derivatives, cash equivalents and other asset types that do not have the specific principal adverse impact data. We believe that these alternative figures provide a more accurate picture of the principal adverse impacts caused by our investments as they focus on relevant categories of exposures and are less influenced by the data availability and coverage.

The share of covered positions per principal adverse impact indicator is expressed as "Coverage" percentage. These figures represent the ratio between the value of assets for which specific principal adverse impact data is available and the "Current value of all investments".

While we try to use the most recently available sustainability data, most of the data used has a time lag which is one of the limitations of the current analysis. Most of the data used is the data collected by our data vendors from the companies' own disclosures which tend to refer to the previous fiscal year. An additional delay may arise due to the time that it takes to collect and process data by the data vendors from the time of its publication by the companies.

Another limitation is the continued lack of reliable, standardised and comparable data. While corporate sustainability transparency has improved in recent years, data availability for certain principal adverse impact indicators remains limited or heavily relies on proxies, estimates, or modelled data which is prone to margins of error. Existing qualitative and quantitative gaps provide limited insights, making it challenging to draw meaningful conclusions. These gaps are especially evident for private entities which are presently not subject to any mandatory disclosure requirements. Even for publicly listed entities, the coverage remains low for certain principal adverse impact indicators as the data is limited to companies operating in specific industries. The existing coverage gaps prevent us from fully integrating certain principal adverse impacts in our investment activities.

Historical comparison

Significant disparities in data quality and coverage across various principal adverse indicators has notably affected the historical comparison.

For indicators used as screening and exclusion criteria in our investment decisions, the data that we use has broader coverage and is based on more established methodologies enabling a more comparable analysis. These indicators include involvement in fossil fuels, manufacturing or selling of controversial weapons, and violations of international norms. Throughout both reporting periods, our portfolio has maintained adherence to these criteria, albeit with minor exposures to such activities through external funds and a limited number of directly owned holdings undergoing engagement or exclusion considerations.

With regard to environmental indicators, our analysis indicates a notable decline in Scope 1 and Scope 2 GHG emissions since 2019 driven by our continued exclusion of fossil fuels and growing number of companies within our portfolio adopting GHG reduction targets. It is important to note that fully comparing the latest GHG emissions data with historical data is challenging due to emerging differences in data sources and methods used. Our 2022 data pool contained a substantial portion of estimated or modelled data. Where direct company reporting was insufficient, the gaps have been filled with sector-based estimates or models provided by external data vendors. However, in 2023 there was an increase in reported data from companies' sustainability disclosures. While it is a welcome development indicating improved data reliability, this shift affects the comparability of the data, making it challenging to draw direct parallels or identify patterns between the two reporting periods. Conversely, Scope 3 emissions have shown an upward trend due to enhanced transparency and improved tracking capabilities across corporate value chains, contributing to increased total emissions, as well as carbon footprint and intensity.

Other indicators such as energy consumption intensity, hazardous waste generation ratio as well as GHG intensity for sovereigns have experienced variations between 2022 and 2023 due to methodological changes in the data used and resulting fluctuations that have influenced year-on-year comparisons.

While some corporate principal adverse impact indicators benefited from improved coverage, others saw a decrease due to revised data collection criteria by our data vendor. The new criteria mandates data to encompass at least 90% of a company's operations, resulting in more complete and accurate values but reduced coverage for certain metrics.

In 2023 SEB IM initiated steps to address existing ESG data gaps by collecting data for several of its private equity funds with the use of external platforms. These efforts resulted in improved coverage for some indicators, including unadjusted gender pay gap and board gender diversity, allowing for more insights into these figures compared to 2022. More observations on individual principal adverse impact indicators are available in the "Explanation" column of Table 1.

With the imminent commencement of the European Sustainability Reporting Standards (ESRS) and our ongoing efforts to improve data collection mechanisms, we expect that the quality and availability of data will improve over time. However, the transition to full data maturity will likely require additional years to enable more robust and comparable historical comparison.