

Responsible	Security Class	Date	Replaces version dated
Hållbarhetsansvarig	2/Intern	2023-02-23	2021-02-24

The Board of Directors of SEB Pension och Försäkring AB, registration number 516401-8243, (the “Company”) has on 23 February 2023 adopted the following

Instruction regarding corporate sustainability

1 Introduction

- 1.1 The Company has, together with its ultimate parent company Skandinaviska Enskilda Banken AB (publ.) (“SEB”), an ability and responsibility through its provision of universal financial services to contribute to the promotion of sustainable growth and prosperity. The Company defines corporate sustainability as providing financial services to its customers in a way that provide long-term economic, social and environmental value for its customers, its shareholders and society at large.
- 1.2 The Company is part of the SEB Group in which the ultimate parent company is SEB. The sustainability work of the Company is partly carried out by SEB.
- 1.3 This instruction is supplemented by, SEB’s Environmental Policy, Social and Human Rights Policy, Tax Policy, and SEB’s sector policies¹ as well as position statement². The latter regulate SEB’s view on specific key issues and industry sectors that are considered critical from an environmental and social perspective. The Company’s way of working is also expressed in the Company’s Code of Conduct, Inclusion and Diversity Policy and through the Company’s core values, aligned with those of SEB.

2 Purpose

- 2.1 The purpose with this instruction is to establish and define the framework for corporate sustainability within the Company and provide a governing platform for the Company’s sustainability work in all business decisions.
- 2.2 Sustainability considerations regarding investment activities are defined in the Company’s investment guidelines. Instructions in other areas may also further define the integration of sustainability in the Company’s activities.

3 Corporate sustainability statement

- 3.1 The Company, together with SEB, recognizes that a prerequisite for a prosperous and sustainable society is an awareness of sustainability challenges and a willingness and ability to act. Concerning the environment, the Company, together with SEB, has an important role to play in adjusting its strategy towards a low carbon economy in line with the Paris Climate Agreement.

¹ Agriculture, Aquaculture, Fishing and Animal Welfare, Arms and Defence, Forestry, Fossil Fuels, Gambling, Mining and Metals, Renewable Energy and Electricity Transmission and Distribution, Shipping, Tobacco and Transportation

² Position on Modern Slavery Act

- 3.2 Sustainable development is an important and integral part of the pursuit of value creation for customers, employees, shareholders and society at large. The Company is convinced that by integrating sustainability in its operations and business decisions the Company will have the prerequisites to be more successful in the long term.
- 3.3 The strive towards achieving United Nations' Sustainable Development Goals (SDGs) will have significant implications on investment needs in developing and Corporate developed countries. The Company, together with SEB, seeks to contribute to the SDGs through its products and services in the offerings to its customers, enabling them in their contribution to the realization of the SDGs.
- 3.4 The Company aims to minimize risks for any direct and indirect adverse impact on environment and climate, human rights and labour rights as well as from issues relating to anti-corruption. The Company does not use nor facilitate tax evasion or tax avoidance arrangements.

4 Corporate sustainability management

- 4.1 The Company, together with SEB, aims to be a leading catalyst in the sustainability transition. SEB measures its progress through KPIs in the areas of green activity in investments. As the inclusion of sustainability into all aspects of commercial activities becomes paramount, the Company's ability to support its customers will be dependent on a continuous development of sustainability capacity and know-how within all functions combined with established supportive functions, metric targets and incentives to develop in line with our customers' and stakeholders' demands.
- 4.2 To reach the goal of being a leading catalyst in the sustainability transition SEB continuously enhance its capabilities in the field of sustainability. The following are SEBs "Important Enablers" to realize the strategic ambitions, as applicable when applied to the Company's operations:

Competence development. The Company invests in its staff by continuously offer internal and external training making sure the position within sustainability is safe-guarded.

Investment offering. The Company strives to have a comprehensive and competitive investment offering with sustainability risks and impacts integrated into investment processes and products.

Product Development. The Company strives to continuously be top rated and in the fore front of developing new and existing products and services for its customers.

Advisory capacity. The Company utilizes the full sustainability know-how within the SEB Group and understanding of the regulatory landscape to support our customers.

Impact. The Company aims to consciously steer its impact through the deployment of services, products and capital in line with sustainability commitments and supported by metric targets.

Risk Management. The Company ensures that appropriate sustainability risk due diligence is available in relevant decision making bodies to support management in conducting business.

5 Stakeholder engagement

- 5.1 Customers, suppliers and current and future employees are all important stakeholders of the Company. The Company takes a keen interest in their opinions and selection criteria. Together with SEB, the Company's position and importance in society combined with its stakeholders' views form the foundation for the Company's sustainability commitments and strategy.

6 Committee for sustainability risk

- 6.1 The Company shall have a committee that will assess and advice upon a new investment objective from a material sustainable risk perspective, before bringing the investment objective to a business proposal decided by the relevant decision body.

7 Reporting

- 7.1 The Company shall be transparent in its efforts to support long-term sustainable development of its operations. SEB reports publicly on the sustainability work of the Company in conjunction with the Annual Report for the SEB Group.

8 Sustainability commitments

- 8.1 The Company, together with SEB, recognizes the importance of participating in and supporting international commitments that enable businesses to operate in a more sustainable way. SEB supports the following international agreements³ and international frameworks:

International agreement

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| – UN Sustainable Development Goals | 17 globally agreed goals for 2030 developed by governments, the private sector and civil society to achieve a sustainable development for our planet. |
| – The Paris Climate Agreement | An agreement between governments to limit global warming to well below 2 degrees compared to pre-industrial levels. |
| – Universal Declaration of Human Rights | An expression by all governments in the United Nations of the rights and freedoms everyone is entitled to. |

³ State level agreements which partly or wholly relate to business, but with no formal mechanism for business to endorse or join.

– The eight ILO Core Conventions on Labour Standards ⁴	Eight ILO principles and rights to work that are considered fundamental for the world of work and should be prioritized for ratification into national laws.
– UN Guiding Principles on Business and Human Rights	A set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.
– The Children's Rights and Business Principles	Principles to guide companies on actions they can take in the workplace, marketplace and community to respect and support children's rights.
– OECD Guidelines for Multinational Enterprises	Recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognised standards. They come with a government-supported office (National Contact Point) to handle 'specific instances' (grievances) against companies who allegedly have failed to meet the Guidelines' standards.

SEB is a member of, or has signed, the following business related commitments.

International Framework

– UN Global Compact	Framework for corporates to implement universal sustainability principles in the areas of human rights, labour rights, environment and anti-corruption.
– UNEPFI – Principles for Responsible Banking	Strategic sustainability framework for banking to enable a positive contribution to society by integrating the Paris Climate Agreement and SDGs in objectives and business processes.
– UNEPFI – Net Zero Banking Alliance	The members are committed to aligning their lending and investment portfolios with net-zero emissions by 2050.
– The Net Zero Asset Managers' Initiative	The members have committed to achieve net zero alignment by 2050 or sooner, drawing on the Net Zero Investment Framework to deliver these commitments.

⁴ Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) ; Right to Organise and Collective Bargaining Convention, 1949 (No. 98); Forced Labour Convention, 1930 (No. 29); Abolition of Forced Labour Convention, 1957 (No. 105); Minimum Age Convention, 1973 (No. 138); Worst Forms of Child Labour Convention, 1999 (No. 182); Equal Remuneration Convention, 1951 (No. 100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111) against companies who allegedly have failed to meet the Guidelines' standards

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| – Equator Principles | A risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects. Primarily intended to provide a minimum standard for due diligence and monitoring. |
| – Task Force on Climate Related Financial Disclosure (TCFD) | The TCFD is an industry-led initiative created to develop a set of recommendations for voluntary climate-related financial disclosures for use by companies in providing information to stakeholders, lenders, insurers, and other stakeholders. |
| – UN Supported Principles for Responsible Investments (PRI) | Six investment principles that offer a menu of possible actions for incorporating ESG issues into investment practice in order to better align investors with broader objectives of society. |
| – Poseidon Principles | A global bank initiative to reduce the emission of greenhouse gases from shipping consistent with the International Maritime Organisation's ambition that by 2050 carbon dioxide emissions from shipping shall be reduced by 50% compared with the base year 2008. |
| – Responsible Ship Recycling Standards, (RSRS) | A joint bank initiative for ensuring environmentally and socially responsible dismantling and recycling of ships |

9 Updating of the instruction

- 9.1 This instruction shall be updated as required, but at least annually.
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