
Responsible	Security Class	Date	Replaces version dated
Sustainability Lead	2/Intern	2024-06-18	2023-02-23

The Board of Directors of SEB Pension och Försäkring AB, registration number 516401-8243, (the “Company”) has on 18 June 2024 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 draws, within its applicability, on SEB’s Sustainability policy framework as well as Tax policy. 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 define the framework for corporate sustainability, ensure the integration of sustainability risks in the governance of the Company and provide a governing platform for the Company’s sustainability work.
- 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, is convinced that companies that include sustainability in their operations and business decisions have the prerequisites to be more successful in the long term. The Company, together with SEB, will participate in the transition towards a low carbon and sustainable economy with its customers and other stakeholders.
- 3.2 Achieving the Paris Agreement and the United Nations’ Sustainable Development Goals will have a significant impact on global investment needs. The Company, together with SEB, seeks to contribute to the goals by combining advisory expertise and products in the offerings to its customers, enabling them in their contribution to the realization of society’s goals. Thereby, The Company, together with SEB, will

create value from a financial, social and environmental perspective together with its customers.

- 3.3 The Company, together with SEB, aims to minimize risks for any direct and indirect adverse impact on the climate and environment as well as on human rights and labour rights. It is a priority to protect the wellbeing of customers and society at large. The Company does not use nor facilitate tax evasion or tax avoidance arrangements.

4 Corporate sustainability management

- 4.1 As sustainability is integrated into all aspects of commercial activities throughout society, the ability to support customers will be dependent on a continuous development of sustainability capacity and know-how within all functions, combined with established supportive functions, internal and external metrics and incentives to develop in line with customers' and stakeholders' demands.

- 4.2 To support the transition towards a sustainable and low carbon economy, the Company, together with SEB, continuously enhances its sustainability-related capabilities. The following are important enablers to realize the strategic ambitions:

Competence development. The Company, together with SEB, invests in its staff's abilities to support customers, by continuously offering internal and external training – ensuring a thought-leading position within business related sustainability.

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

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

Sustainability data management. The Company, together with SEB, continuously develops its ability to in-source, enhance and produce extensive, correct, and timely sustainability data, which will allow it to capture sustainability-related business opportunities, measure impact and support its customers in their sustainability transition. Such data will furthermore enable external sustainability reporting requirements.

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

5 Corporate sustainability governance framework

- 5.1 The Company shall ensure that sustainable-related governance structures, including procedures and controls, are in line with the business plan as well as applicable sustainability policies and instructions.

- 5.2 The Company shall:
- I. Have procedures for decisions and escalation on sustainability-related issues of high importance for the Company, and;
 - II. Ensure that sustainability related regulations are assessed, instructions are adopted, procedures and controls regarding corporate sustainability requirements are implemented, and;
 - III. ensure risks within the sustainability area are managed and controlled, and;
 - IV. ensure that resources are assigned the above tasks.

6 Reporting

- 6.1 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.
- 6.2 According to the Corporate Sustainability Governance Instruction for the SEB Group, the responsibility for consolidating relevant sustainability related financial and non-financial data into the Sustainability Report in a timely manner lies within SEB and Group Finance.
- 6.3 The Company shall ensure reporting complete and correct sustainability related financial and non-financial data as requested by Group Finance.

7 The Company's own operations

- 7.1 The Company, together with SEB, has an important role to play in supporting awareness regarding sustainability. As a financial institution, the biggest potential adverse impact from own activities is to climate, and the Company, together with SEB, has a responsibility and ambition to reduce its operational climate footprint. SEB as set CO₂-targets for its own operations, which are stated in the Environmental Policy on Climate, Nature, and Water for the SEB Group.

To achieve this the Company, together with SEB, actively works to:

- Improve energy efficiency of its operations and buildings,
- Use renewable energy in buildings owned or rented,
- Reduce business travel by using alternative techniques for meetings and reduce travel related emissions by choosing biofuel where possible,
- Shift to electrified fleet of company cars,
- Together with SEB, work with suppliers to minimize SEB's broader carbon footprint from operations,
- together with SEB, provide transparent public reporting on SEB's emissions profile and the actions SEB undertakes to manage and

mitigate emissions,

SEB also has a Code of Conduct for Suppliers, which includes a number of principles.

8 Sustainability commitments

- 8.1 SEB recognizes the importance of participating in and supporting international commitments that enable businesses to operate in a more sustainable way. The international agreements and international frameworks supported by SEB is set out in the Corporate Sustainability Policy for the SEB Group.

9 Updating of the instruction

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