

Exclusion Instruction

1. Objective

This Instruction defines the framework for how we in Danske Bank integrate exclusions in our investment management processes on basis of sustainability-related considerations.

Our approach to responsible investment is based on the principle of Double Materiality meaning that we consider sustainability factors from the perspective of:

1. Financial Materiality: Protect the value of our investments and generate attractive returns
2. Environmental and Social Materiality: Reduce the negative impacts and maximize the positive impacts that our investments have on society.

The Instruction operationalises our general commitment to consider and prioritise the principal adverse impact that our investment decisions may have on society as prioritised through investment products under management in accordance with the Responsible Investment Policy.

The Instruction also works to protect the value of our clients' investments in that exclusions defined by this Instruction limit exposures to issuers negatively impacted by sustainability factors to the extent applied by relevant products.

2. Definitions

The definitions for the terms used throughout this Instruction are available in Appendix 1. Any term not defined herein shall have the meaning ascribed to it in the Responsible Investment Policy.

3. Scope and target group

The Instruction applies to investment management activities of Danica Pension as covered by the Responsible Investment Policy. Exclusions governed by this Instruction are applied to different degrees and in different combinations by investment products managed by Danica Pension. The extent to which an exclusion applies to a given investment product is to be outlined in pre-contractual disclosures of that product.

The Instruction covers direct investments in instruments (e.g. equity, bonds) issued by issuers that are excluded per the exclusions outlined in this Instruction. This also includes labelled sustainability bonds issued by excluded issuers. Affiliation to an excluded issuer does not trigger an exclusion of instruments issued by such affiliated entity. Sovereign based exclusions can also capture other related issuers such as state-owned enterprises.

The Instruction does not apply to investments in derivatives. Subject to the binding elements of a given investment product, indirect investments in issuers through underlying funds are not in scope of this Instruction.

Exclusions covered by this Instruction are supplemented by statutory restrictions/bans on investing in issuers targeted by sanctions as governed through Danica Pension's AML/CTF and Sanctions Policy.

This Instruction applies to all employees, functions, and units in Danica Pension that are involved in or oversee investment management activities.

The Instruction is also applicable to any employee, function and/or units in Group subsidiaries if adopted and/or incorporated by the subsidiary in accordance with applicable governance rules.

4. Exclusions

For the investment products, we make available, we apply different exclusions aimed to reduce adverse impacts and risk exposures to certain investments.

Exclusions captured by these categories are outlined in the table below. Sustainability risk related exclusions apply to all managed investment products (to be implemented in the course of 2025). Other exclusions apply in varying degrees as communicated and promoted to clients through pre-contractual disclosures.

Exclusion	Definition	Activity	Criteria/ threshold ¹	Data source
Sustainability Risk	Involvement in activities deemed to expose significant sustainability risks to the investment	Incident or activity based	Case-specific	Proprietary Model
Enhanced sustainability standards ²	Norm based: Involvement in sustainability related controversies, practices, or other activities considered unacceptable in relation to international norms defining environmental or social minimum safeguards.	Incident based and/or weak sustainability governance	Case-specific	Proprietary Model
	Good Governance: Screening covering pre-set indicators on sound management structures, employee relations, remuneration of staff and tax compliance. The indicators are purposefully simplistic, considering the differences in market-specific, and industry specific governance practices across the globe, to allow for comparability and monitoring.	Non-adherence to good governance practices		

¹ Revenue threshold means maximum revenue percentage from activity.

² See methodology paper: "Enhanced Sustainability Standards Screening" publicly available at: <https://danskebank.com/sustainability-related-disclosures>

	Country exclusions: Screening of countries' exposure to and management of sustainability factors, aimed at identifying countries that express weak sustainability practices, have weak governance, or have weak social safeguards	Incident based and/or weak sustainability governance		
Extended Enhanced sustainability standards ³	Extended thematic screening on involvement in sustainability related controversies, practices, or other activities considered unacceptable in relations to norms.	Incident based	Case-specific	Proprietary Model
PAI Exclusions	Strongly negative performance across individual and/or in combination of principal adverse impact indicators ⁴ . Includes all mandatory PAI indicators and certain voluntary indicators.	Sustainability performance	Performance based	ISS-ESG, Responsible Investment
Tar sands	Tar sands, also known as oil sands, heavy oil, crude bitumen, or more technically bituminous sands, are a type of unconventional petroleum deposit. Tar sands are either loose sands or partially consolidated sandstone containing a naturally occurring mixture of sand, clay, and water, saturated with a dense and	Surface mining (Production "P") In-situ recovery (P)	>5% revenue	ISS-ESG

³ See methodology paper: "Enhanced Sustainability Standards Screening" publicly available at: <https://danskebank.com/sustainability-related-disclosures>

⁴ Thresholds defined in the Danske Bank SDG Model methodology paper available on: <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

	extremely viscous form of petroleum technically referred to as bitumen (or colloquially as tar due to its superficially similar appearance).			
Thermal coal ⁵	<p>Thermal coal designates coal used by power plants and industrial steam boilers to produce electricity or process steam.</p> <p>Coal extraction: Coal extraction refers to the process of mining/extracting coal from the surface of the ground or underground mines. Surface mining is also referred to as 'opencast' mining and underground mining as 'deep' mining.</p> <p>Power generation: Generation of electricity using thermal coal as the energy source.</p>	<p>Surface mining/ "opencast mining" (P)</p> <p>Underground mining/"deep mining" (P)</p> <p>Power generation (Downstream "D")</p>	>5% Revenue	ISS-ESG
Peat-fired power generation	Peat is organic fuel consisting of spongy material formed by the partial decomposition of organic matter, primarily plant material, in wetlands.	Power Generation (P)	>5% Revenues	ISS-ESG
Fossil fuels ⁶	Fossil fuel, any of a class of hydrocarbon-containing materials of biological origin occurring within earth's crust that can be used as a source	<p>Exploration (P)</p> <p>Production (P)</p> <p>Refining (D)</p> <p>Transportation (D)</p> <p>Storage (D)</p>	> 5% Revenue	ISS-ESG

⁵ The Responsible Investment Committee may on exemption basis approve that issuers qualifying under the Net Zero Pathway Framework for Investee Companies are investable under this category. The Net Zero Assessment methodology is available at: <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

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	of energy. Fossil fuels include coal, petroleum, natural gas, oil shales, bitumens, tar sands, and heavy oils.	Energy equipment & services ⁷ (Upstream “U”) Power Generation		
Fossil Fuel Transition Laggards ⁸	“Fossil Fuel Transition Laggards” is an exclusion criterion linked to investee companies in scope of the “Fossil Fuel” definition with >5% revenues associated to the outlined activities. Investee companies are excluded for this category, if they are assessed as either “Not aligned/Not transitioning to Net Zero” or “Committed to Net Zero”, in accordance with the proprietary model maintained and developed by Danske Bank ⁹			
Controversial weapons	<p>Controversial weapons include the following:</p> <ul style="list-style-type: none"> • Anti-personnel mines • Biological weapons • Chemical weapons • Cluster munition • Nuclear weapons outside the Non-Proliferation Treaty • Depleted uranium ammunition and armour • Incendiary weapons • • White phosphorus weapons <p>The weapons are considered controversial as their production and use are assessed to be in conflict with the prohibitions set out in international conventions.</p>	Production (P)	>0% Revenue	ISS-ESG
		Maintenance (D)		
		Sale (D)		
		Prime Contracting (D)		
		Key Sub-Contracting (U)		
		Supplier of Key Components (U)		
Tobacco		Leaf growing (P)		ISS-ESG

⁷ Based on GICS industry group classification (101010) subject to availability and accuracy of data in relation to the industry classification.

⁸ Not currently implemented.

⁹ The Net Zero Assessment methodology is available at <https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures>

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	Tobacco products are products made entirely or partly of leaf tobacco as raw material, which are intended to be smoked, sucked, chewed or snuffed. Tobacco products are also electronic cigarettes and other 'Next-Generation-Products'.	Harvesting (P) Curing (P) Leaf processing (P) End-product manufacturers (D) Value-added resellers (D) (VAR)	>5% Revenue	
Alcohol	Alcohol refers to alcoholic beverages with alcohol volume higher than 2.25%. Alcohol is a psychoactive drug that is the active ingredient in drinks such as beer, wine, and distilled spirits.	Producers ¹⁰ Liquor stores (D) Malt, barley, other commodity inputs (U)	>5% Revenue	ISS-ESG
Gambling	Gambling refers to the wagering of money on a game or event such as sports, cards or dice games, gaming machines and lotteries. Gambling has historically taken place in physical venues but is now also taking place online.	Betting operators (P) Casinos (P) Lotteries (P) Gambling brokers (P) End-product manufacturer (P) Affiliates/Lead generation/ performance marketing (D) Integrated casino systems (U)	>5% Revenue	ISS-ESG
Military equipment	Military equipment refers to equipment that have been developed, designed or modified for military use based on military specifications. It covers both combat equipment as well as other military equipment with non-lethal functionality.	Production of combat equipment (tanks, ammunition, missiles, etc.) (P) Maintenance, repair and logistics of combat equipment (U) Combat equipment distribution (D)	>5% Revenue	ISS-ESG
Pornography	Adult Entertainment/ Pornography refers to explicit images of sexual behaviour that are intended to cause	Production (P) Broadcasting (P) Distribution (D)	>1% Revenue	ISS-ESG

¹⁰ Winery owners & operators, Brewing, Distilling, Fermenting as defined by GICS 30201010 and 30201020 subject to availability and accuracy of data in relation to the industry classification.

	sexual excitement. This includes products labelled 'erotica', 'porn' or 'adult entertainment'.			
SPU	SPU refers to the exclusion list maintained by Norges Bank Investment Management/Staten s Pensjon Utland ¹¹	Multiple activities	Case-specific	Norges Bank Investment Management/ Staten s Pensjon Utland
PAB	Activity based exclusions referred to in Commission Delegated Regulation (EU) 2020/1818 Article 12(1)(2)	Multiple activities	Multiple thresholds	MSCI and/or Proprietary Model
CTB	Activity based exclusions referred to in Commission Delegated Regulation (EU) 2020/1818 Article 12(1)(2)	Multiple activities	Multiple thresholds	MSCI and/or Proprietary Model

As a general rule, an investment product is not allowed to invest in issuers excluded per the exclusion list of a given exclusion category and any excluded issuer in an impacted product should be divested within the outlined timelines as set out in Section 7 of this Instruction.

As an exemption to the main rule, certain investment products may from time to time be allowed to hold excluded investments in their portfolios if the investment is deemed non-material and services a due cause. Non-material investments are investments which do not result in a product having more than 0.49% of its total investments in excluded positions. Investments with a due cause are investments assessed to be in the best interest of clients based on fiduciary duties and/or investments where upholding an exclusion could result in non-proportional effects, including (as a non-exhaustive list):

- investments where a sale will result in significant unfavourable terms.
- indirect exposures upheld through underlying funds having minor discrepancies in the exclusion criteria, definition and/or criteria resulting in the breach
- operational limitations not making divestments possible (e.g. sanctions, legal & contractual obligations, market conditions, lack of substitutions)

The use of such exemption must always be considered at a case-by-case basis in light of the specific circumstances, disclosures of the investment product and commitments. Exempted investments are subject to approval of the Responsible Investment Committee.

4.1 Data sources

Data sources used for exclusions are assessed by the Responsible Investment team in Danske Bank on a continuous basis. The assessments include, but are not limited to, assessments on data coverage, data quality, methodology, costs, and other Danica Pension operational considerations.

No universally accepted framework (legal, regulatory, or others) currently exists in relation to sustainability-related data, information, and assessments. As a financial institution investing globally in different asset classes, Danica Pension strives to the extent possible to leverage primary reported data and information. Where such is not available, best efforts are made to obtain data, including data estimates, information, and assessments through third-party providers or directly from investee

¹¹ Observation and exclusion of companies | Norges Bank Investment Management (nbim.no)

companies, and/or by carrying out additional research or making own reasonable assumptions/estimations.

Sustainability-related data, information, and assessments is therefore not comparable to that of financial information. This implies a risk of misrepresentation of data on sustainability-dimensions or impacts associated to an investment. Despite diligent due diligence in the onboarding of data and other resource and cost proportional considerations in place to ensure the accuracy, completeness, and reliability of the data, it is not possible to verify nor guarantee, directly or indirectly, the complete correctness of the underlying data. Therefore, a certain margin of error is still to be expected.

How sustainability-related data, information and assessments are utilized is subject to the specific models, methodologies, and processes applied and governed by Danica Pension's Responsible Investment Policy, Instructions as well as Guidelines.

The Responsible Investment team is responsible for selecting the data source most relevant to each exclusion category.

5. Governance

Any changes to exclusion lists maintained under this Instruction are subject to approval by the Responsible Investment Committee, as represented through the Danica Chief Investment Officer.

The Responsible Investment Committee further endorses changes made to exclusion criteria on basis of advice from relevant functions with its effectiveness being subject to approval by the Head of LC&I, Danske Bank.

6. Implementation

Exclusion lists are updated on a bi-annual basis unless a review is triggered by other events.

A decision to exclude a company/issuer is implemented no later than on the first bank day of the second month following a decision by the Responsible Investment Committee to exclude. Once implemented, divestments of direct investments should be made within five working days. For indirect investments, divestments are to be made within reasonable time, taking into account aspects such as fiduciary duties, committee schedules, operational implications, and substitution options.

If selling is not possible for liquidity reasons, divestments will be put on hold pending the opportunity to sell at a reasonable price, holdings will be sold.

From time-to-time, updates may be done at other times than outlined above. This could be due to special events/situations, sanctions (impacting ability to sell-off) or due to operational considerations. Responsible Investment has the authority to decide on such extraordinary updates.

7. Disclosures

The list of excluded issuers is maintained by the Responsible Investment team and is to be published in the document "Excluded Investments" available on:

<https://danicapension.dk/om-danica-pension/baeredygtighed/ansvarlige-investeringer/restriktioner>

Equally information on such companies/issuers that are granted exemptions is available in the document "Excluded Investments".

8. Escalation

The administrator of the Exclusion Instruction must report to the Executive Leadership Team the following significant breaches to the Instruction.

- Overdue Instruction exemptions
- Instruction not approved annually

Any potential problematic case concerning the Group must be escalated in accordance with the Escalation Policy.

Instruction owner must escalate to the governing body in case of breaches to their instruction and if the maintenance of their instruction is not able to be completed in accordance with the Responsible Investment Policy.

9. Change log

Date	Version number	Description of changes
02 December 2022	1.0	Instruction created
April 2023	Version 2.0	Instruction updated for further clarification purposes and enhancement of process, including review cycles.
July 2023	Version 3.0	Updates to Fossil Fuel category and change of data provider as well as editorial changes.
March 2024	Version 4.0	Update to the Controversial Weapons category. "Fossil Fuel Transition Laggards" added as a new Exclusion criteria. Editorial changes has also been made.
October 2024	Version 5.0	Update to Alcohol and Military Equipment categories. "PAB" and "Enhanced Sustainability Standards Plus", sustainability risks and CTB added as new Exclusion Criteria. De minimis thresholds introduced. Removal of types of exclusion categories

10. List of appendices

Appendix 1 - Definitions

Appendix 2 - Author and input providers

Appendix 1 – Definitions

The below definitions apply to the terms used throughout this Instruction.

Double Materiality	the determination of whether a sustainability factor is of relevance when investing from either the perspective of Financial Materiality and/or Environmental and Social Materiality
ESG	environmental, social or governance
Environmental & Social Materiality	the inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors
Financial Materiality	the outside-in impacts that sustainability factors may have on a company's/issuer's economic and financial activities throughout their entire value chain (both upstream and downstream), affecting the value (returns) of such activities.
