

# Statement on the integration of sustainability risks in decision-making processes

December 2022  
Version 1.0

## 1. Purpose

Pursuant to Article 3 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR"), this statement provides information on how Danske Invest Management A/S, Danske Invest Fund Management Ltd. and Danske Invest Asset Management A/S (collectively "Danske Invest") integrate sustainability risks in investment decision-making processes for assets under management.

## 2. Sustainability risk

SFDR defines "sustainability risk" as an environmental, social or governance (ESG) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

Danske Invest applies the definition of sustainability risk in SFDR.

Sustainability risks relate, among other things, to the following topics:

**Environment:** Energy consumption and efficiency; extreme weather events such as floods and strong winds; pollution incidents; biodiversity or marine habitats damage.

**Social:** Inclusion/inequality; labour strikes; health and safety incidents such as injury or death; product safety issues.

**Governance:** Tax evasion; discrimination within a workforce; inappropriate remuneration practices; lack of protection of personal data.

## 3. Integration of sustainability risks

As a part of our fiduciary duties to customers, we are committed to identify negative risk exposures with a financial impact on the investments that we manage on behalf of our customers. This implies a duty to systematically identify and manage sustainability factors that may pose a risk of causing material negative impact to the value of an investment (sustainability risk) and to integrate considerations of such factors into our investment products.

Our commitment to integrate sustainability risks in our portfolio management services is enshrined by the Responsible Investment Policy adopted by the Board of Directors of Danske Invest. For the effective implementation of these commitments we follow the Sustainability Risk Integration Instruction of the Danske Bank Group.

The Policy and the Exclusion Instruction can be found on;

[https://www.danskeinvest.fi/page/vastuulliset\\_sijoitukset\\_tietoa](https://www.danskeinvest.fi/page/vastuulliset_sijoitukset_tietoa)

[https://www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](https://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

[https://www.danskeinvest.lu/page/responsible\\_investments\\_insight](https://www.danskeinvest.lu/page/responsible_investments_insight)

[https://www.danskeinvest.se/page/ansvarsfulla\\_investeringar\\_insikt](https://www.danskeinvest.se/page/ansvarsfulla_investeringar_insikt)

[https://www.danskeinvest.de/page/verantwortungsvolle\\_investitionen\\_einblick](https://www.danskeinvest.de/page/verantwortungsvolle_investitionen_einblick)

Change log

Date	Version number	Comments/changes
30 December 2022	1.0	<p>Statement on integration of sustainability risks in decision-making processes and in investment created.</p> <p>The statement replaces website text on the integration of sustainability risks, which has been in place since 10 March 2021, providing reference to Danske Bank's Responsible Investment Policy and Sustainable Finance Policy setting, at that time, the overall expectations for the integration of sustainability risks in decision-making processes and in investment and insurance advice.</p>