29 April 2025

Active Ownership Report 2024

Danske Invest

Active Ownership Report



When investors entrust us with their assets and savings, it is our duty to serve their interests by providing investment solutions with the goal of delivering competitive and long-term performance. Our firm commitment to **Responsible Investment** is an integral part of this duty. It is about making better-informed investment decisions – addressing issues of risk, problems, and dilemmas, and influencing our investments through active ownership to contribute to a positive outcome. The exercise of active ownership activities is in line with our **fiduciary duty**, which is to consider what is in the best interests of our investors.



Active ownership – through direct dialogue, collaborative engagement and where relevant, through voting at general meetings – is an important part of our ability to create long-term value in our investments and to our investors. Our approach is based on the belief that exercising Active Ownership in certain situations can facilitate the resolution of challenging issues more effectively than the imposition of exclusions and/or divesting, which could limit Danske Invest's opportunities as a responsible investor. By remaining invested and engaging, we believe that we are better positioned to influence companies and other issuers to properly manage Sustainability Risks, reduce negative impacts or maximise their positive impact on the environment or other societal dimensions, while monitoring their financial performance and management of financial risks.



The aim of our **Active Ownership Report** covering three parts 'Engagement', 'Voting' and 'Collaborative Initiatives' is to demonstrate how our Active Ownership Policy has been implemented throughout the year.

The 3 parts of the report



Part 1 – Engagement



Part 2 – Voting



Part 3 – Collaborative Initiatives



Active Ownership	The use of rights and position of ownership to influence the activities or behaviour of investee companies and other issuers based on financial and/or impact materiality considerations. Active ownership is exercised by taking an active interest as an investor in the investee companies' circumstances, development, and management, and by adopting a long-term focus in the company in line with, for instance, the EFAMA Stewardship Code and the Shareholder Rights Directive II	
Danske Bank or the Bank	Danske Bank A/S	
Danske Bank Asset Management	For the purpose of this report, Asset Management covers and represents the assets under management of Danske Bank A/S, Danske Invest Management A/S, Danske Bank Asset Management AS and Danske Invest Fund Management Ltd	
Engagement	Refers to the interactions between the investor and current or potential issuers (which may be companies, governments, agencies, municipalities, etc.) on sustainability, governance or other topics tied to the issuer. Engagements may be undertaken to influence (or identify the need to influence) sustainability practices and/or seek information on the sustainable and financial performance of the issuer. Danske Bank exercises individual engagement or in collaboration with other investors and organisations. Engagements are registered and tracked through a centralised application, which is maintained by the Responsible Investment team. Engagements registered in the centralised application platform are classified under Danske Bank's engagement topics taxonomy	
Environmental and Social materiality	The inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors	
ESG	Environmental, social and/or governance	
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	
Danske Bank Group or the Group	Danske Bank A/S, its branches and its subsidiaries	
Principal Adverse Impacts	A principal adverse impact is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters	
Proxy Voting Advisor	A proxy voting advisor provides research, analysis and corresponding services to support investors in the execution of votes at the general meetings of companies	
Responsible Investment Policy	The Responsible Investment Policy for Danske Bank	
Sustainability factors	Environmental, social and employee-related matters, respect for human rights, anti-corruption and anti-bribery matters	
Sustainability risk	An environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment	
Voting	Refers to the exercise of ownership rights at General Meetings of companies where we own shares. Voting is carried out on management and/or shareholder resolutions to approve or disapprove of corporate governance as well as relevant environmental and social matters. Voting is exercised by ourselves or by proxy	

Where to get additional information?



Responsible Investment Policy

click here



Voting Guidelines

click here



Management of Conflicts
of Interest in
Active Ownership
click here



Principal Adverse Impact Statement

click here



Active Ownership Policy

click here



Engagement Guidelines

click here



Proxy Voting Dashboard

<u>click here</u>



Climate Progress Report 2024 click here

Our active ownership activities in numbers for 2024

1,900 Engagement Interactions

3,238Meetings Voted

39,749 Proposals Voted

587Environmental And Social Proposals Voted



Part 1 Engagement

Introduction to Engagement Activities



Danske Bank Asset Management's Investment and Responsible Investment teams, on behalf of Danske Invest, engage on material sustainability matters in order to seek improvement in performance and processes with the aim of enhancing and protecting the value of investments. They strive to target engagement activities towards issuers, where immediate or long-term sustainability and/or governance related issues, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance, have been identified.



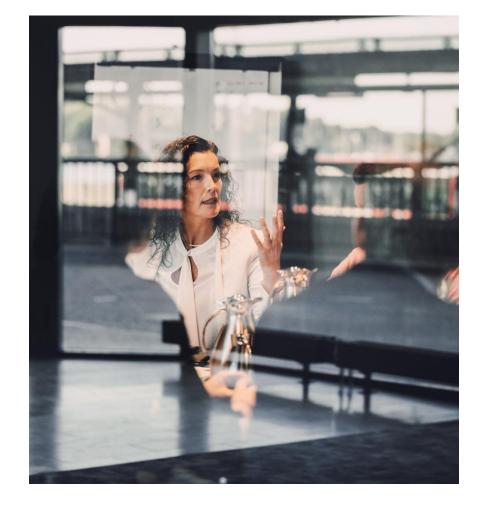
To support the identification of such issues, multiple data sources are reviewed and assessed in an effort to identify potential positive and negative impact of material financial factors and sustainability factors on the performance of the investment and on society.



In order to ensure a structured engagement process, interactions with issuers are logged and monitored through a centralized application, maintained by the Active Ownership team.



The following pages provide an overview of our engagement activities and insights into the overview that is provided.



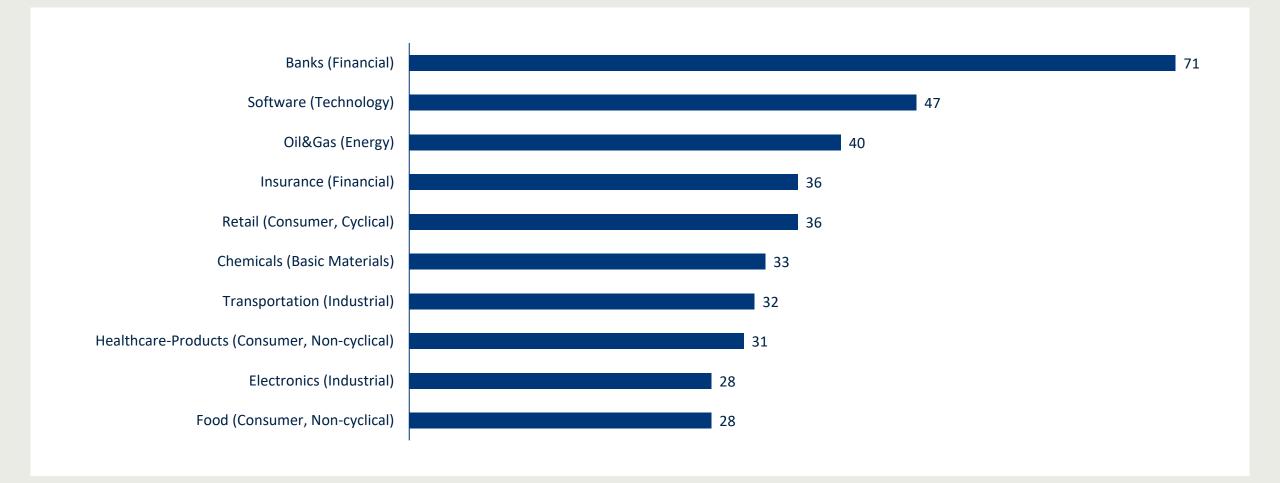
The breadth of engagement activities with corporates in 2024 are represented below

941 48 **Domiciles** Issuers 1,868 109 Engagement Engagement **Interactions** topics



Top 10 industries

In 2024, we engaged with 941 companies. The following graph provides insights into the top 10 industries (sectors in brackets) that those companies operated in

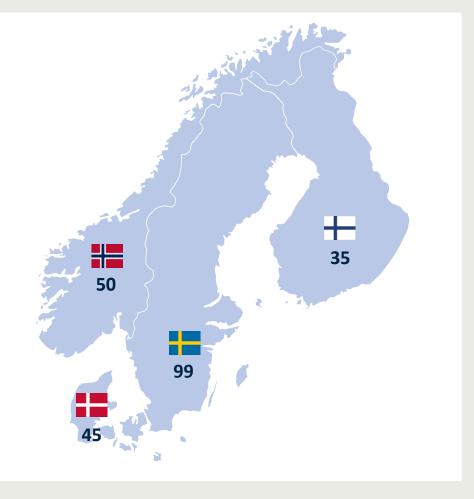




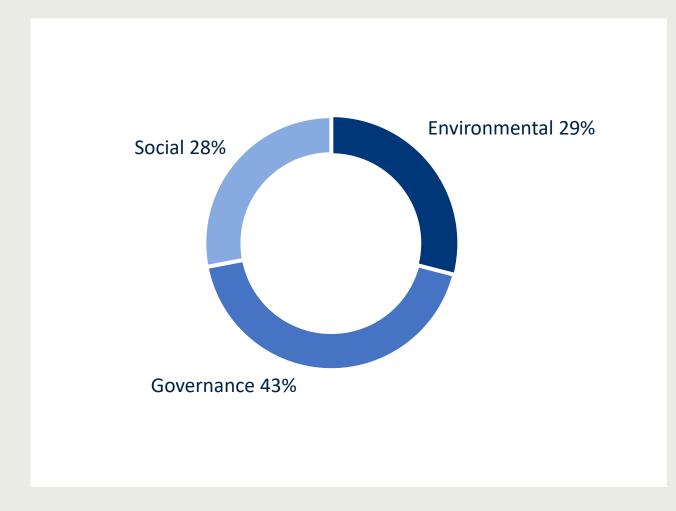
Overview of Engagements Across Markets

In 2024 we engaged with 941 companies that were domiciled across 48 countries. The table provides insights on the top country domiciles

Rank	Country	Count of Companies
1	United States	356
2	Japan	103
3	Sweden	99
4	Norway	50
5	Denmark	45
6	Finland	35
7	Australia	26
8	France	26
9	United Kingdom	20
10	Germany	19
·		



Split between engagement categories





Engagement activities are registered and tracked through a centralised application, which is maintained by Danske Bank Asset Management's Responsible Investment team.



Engagements registered in the centralised application platform are classified under Danske's engagement taxonomy. The topics included within the taxonomy are organized under three categories – Environmental, Social and Governance (ESG).



Presented on this page is an overview of the breakdown of total topics discussed, as organized under the ESG categorization.



Top 7 engagement topics discussed across themes

Engagement interactions with companies may involve more than one ESG topic. As such, below is a presentation of the most discussed topics when considering the total engagement interactions that were held in 2024.

E

Rank	Topic	Count
1	Net Zero	195
2	GHG Emissions	184
3	Energy Management	171
4	Energy Transformation	81
5	Biodiversity	79
6	Energy Efficiency	37
7	Sustainable Products	37

S

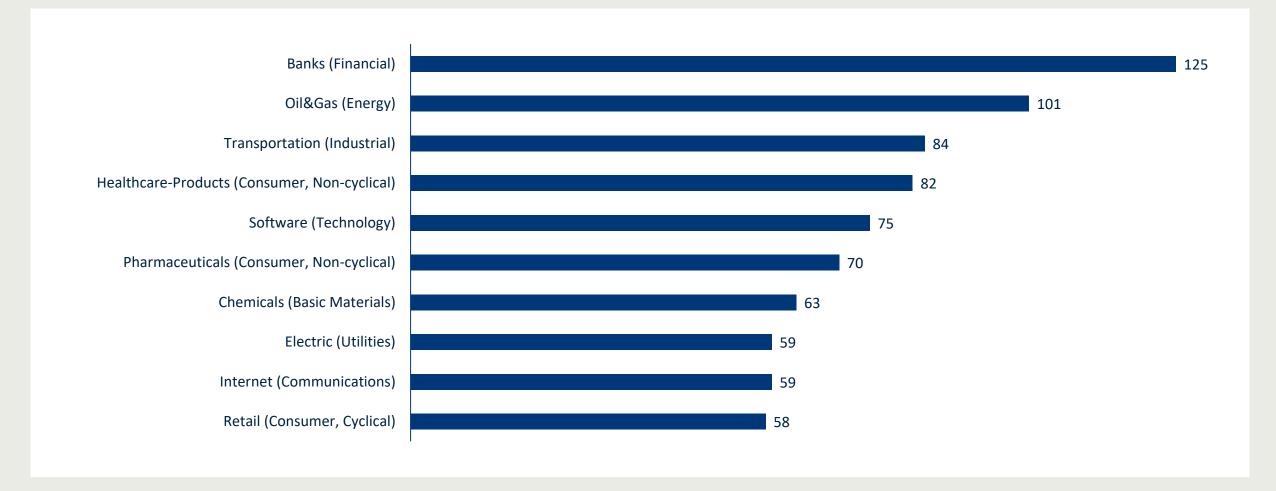
Rank	Торіс	Count
1	Employee Engagement, Diversity & Inclusion	103
2	Employee Retention	95
3	Human Rights & Community Relations	79
4	Digitalisation	49
5	Employee Health & Safety	49
6	Labor Standards/ Practices	48
7	Data Security	46

G

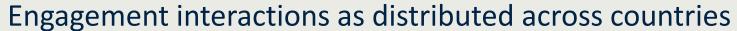
Rank	Торіс	Count
1	Board Composition	290
2	Capital Structure	250
3	Executive Compensation	219
4	Corporate Governance	173
5	M&A	87
6	Dividends	85
7	Executive Composition	82

Top 10 industries most engaged with

In 2024, we engaged with 941 companies. As engagement with these issuers can consist of numerous interactions. The following graph provides insights into the industries with which we had the greatest number of engagement interactions (Sector in bracket)

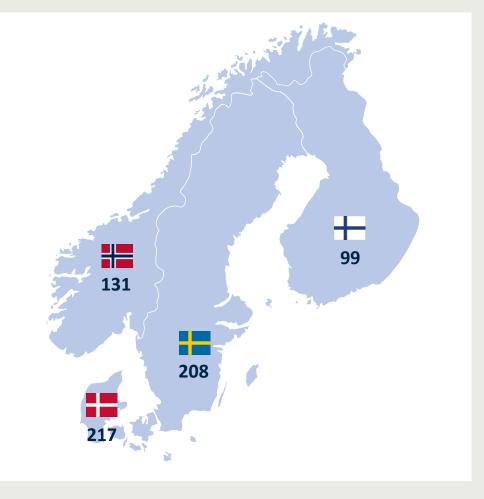






As engagement with companies can consist of numerous interactions, below is a presentation of the top 10 domiciles, as categorised by the number of interactions that were held, and presentation of number of interactions held with issuers domiciled in the Nordics

Rank	Country	Count of Interactions
1	United States	621
2	Denmark	217
3	Sweden	208
4	Japan	177
5	Norway	131
6	Finland	99
7	France	45
8	United Kingdom	44
9	Switzerland	39
10	Australia	34



Engagement Categories per Interactions

Given the prospective breadth of engagement activities, Danske Bank Asset Management approaches and organises engagement interactions across the following categories



Thematic Related

The focus of engagements in this category is on addressing systemic issues that multiple companies may be exposed to. Thematic engagements relate to Biodiversity & Nature, Net Zero Commitments (Largest Emitters Focus), Net Zero Pathway Framework (Fossil Fuels Focus), and Human Rights.



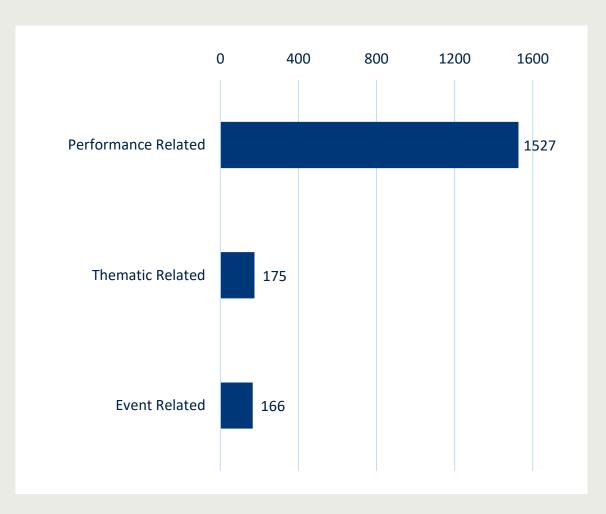
Event Related

Engagement carried out under this category identify issuers with negative operational performance and/or when a severe sustainability event has occurred suggesting that the issuer could implement specific measures to address the sustainability related issue.



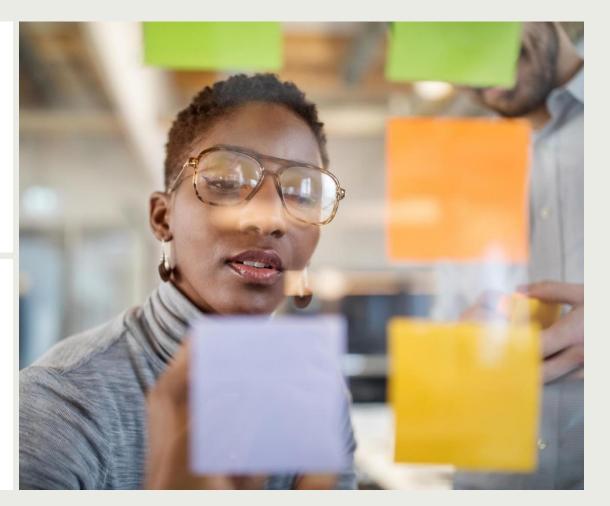
Performance Related

Continuous engagement with issuers is a fundamental part of our investment monitoring processes and supports us in gaining an in-depth understanding of relevant matters pertaining to the issuer and provides an opportunity to communicate concerns, discuss governance issues, and advocate for responsible business practices.



The breadth of engagement activities with sovereigns and supranational entities in 2024 are represented below

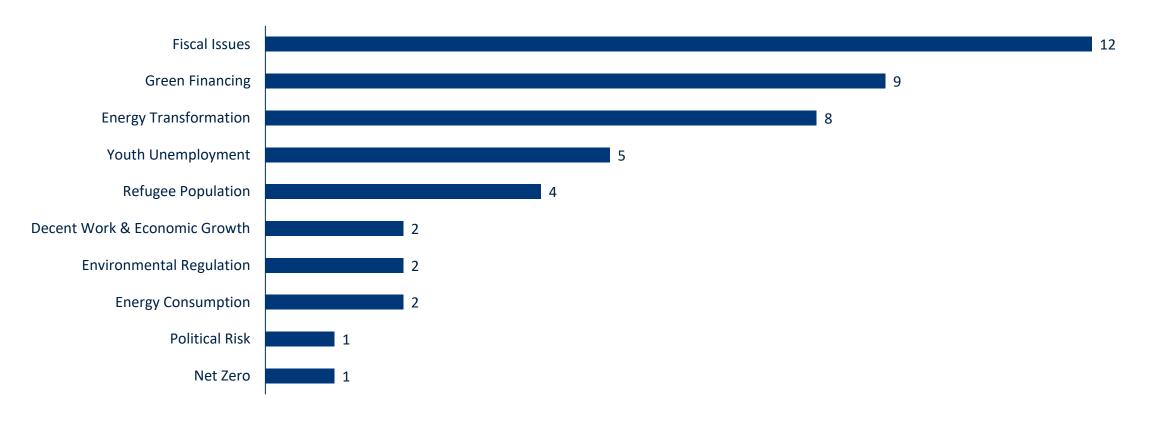
20 18 Countries Issuers 14 **32** Engagement Engagement **Interactions** topics



Sovereign and Supranational related engagements

In 2024, we have had 32 engagement interactions with 20 entities related to the management of strategies involving Sovereign issuers





Principal Adverse Impacts (PAIs)



Danske Invest considers principal adverse impacts of its investment decisions on sustainability factors. Active ownership is one strategy that may be exercised to manage principal adverse impacts.



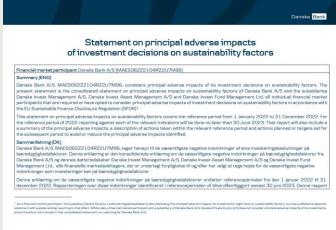
'Principal adverse impacts' means the negative, material or likely to be material effects on sustainability factors caused, compounded by or directly linked to our investment decisions.



Through the consideration of principal adverse impacts, Danske Invest is monitoring and reporting on 16 mandatory principal adverse impact indicators and six voluntary indicators defined by SFDR. The aim is to address these impacts at different degrees on an investment product and entity level in order to reduce the negative footprint our investments have and/or may have on society. How and to what extent we consider and address principal adverse impacts will evolve over time. Information on how active ownership is utilised to mitigate principal adverse impacts is outlined in our Active Ownership Policy.

Find information



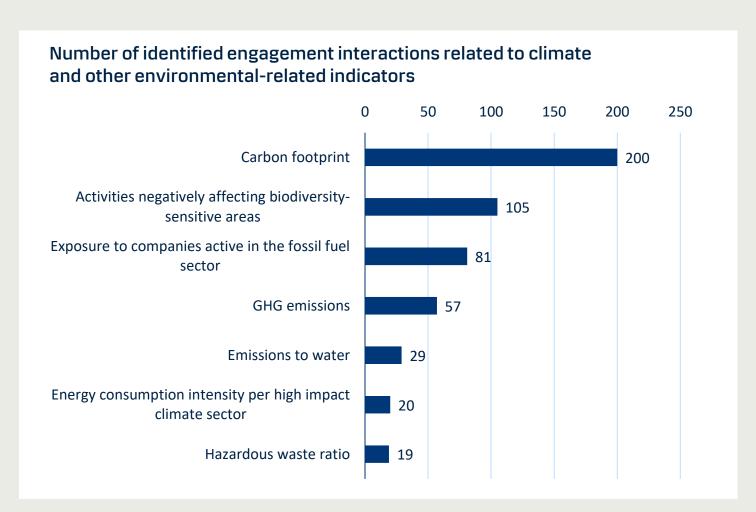


Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to environmental indicators that are within scope for Danske Invest's principal adverse impact monitoring and reporting

Climate and other environmental-related indicators

- Indicator 1. GHG emissions
- Indicator 2. Carbon footprint
- Indicator 3. GHG intensity of investee companies
- Indicator 4. Exposure to companies active in the fossil fuel sector
- Indicator 5. Share of non-renewable energy
- **Indicator 6.** Energy consumption intensity per high impact climate sector
- Indicator 7. Activities negatively affecting biodiversitysensitive areas
- Indicator 8. Emissions to water
- Indicator 9. Hazardous waste ratio
- *Indicator 19.* Investments in companies without carbon reduction initiatives



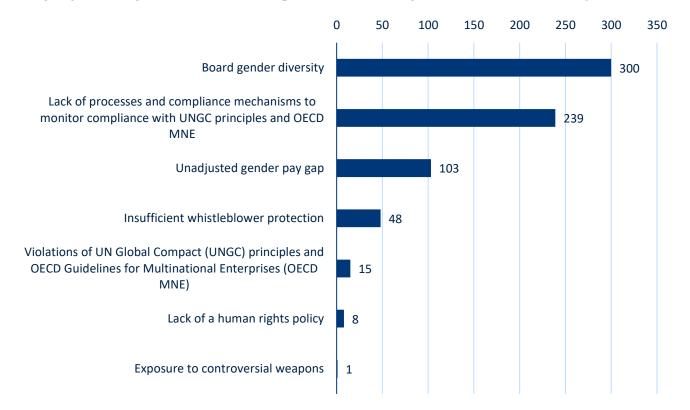
Principal Adverse Impact Monitoring and Reporting Scope for Companies

Overview of engagement interactions that are assessed to be related to social and employee matters indicators that are within scope for Danske Invest's principal adverse impact monitoring and reporting

Social and employee, respect for human rights, anti-corruption and anti-bribery matters

- Indicator 10. Violations of UN Global Compact (UNGC) principles and OECD Guidelines for Multinational Enterprises (OECD MNE)
- Indicator 11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD MNE
- Indicator 12. Unadjusted gender pay gap
- Indicator 13. Board gender diversity
- Indicator 14. Exposure to controversial weapons
- Indicator 20. Insufficient whistleblower protection
- Indicator 21. Lack of a human rights policy

Number of identified engagement interactions related to social and employee, respect for human rights, anti-corruption and anti-bribery matters

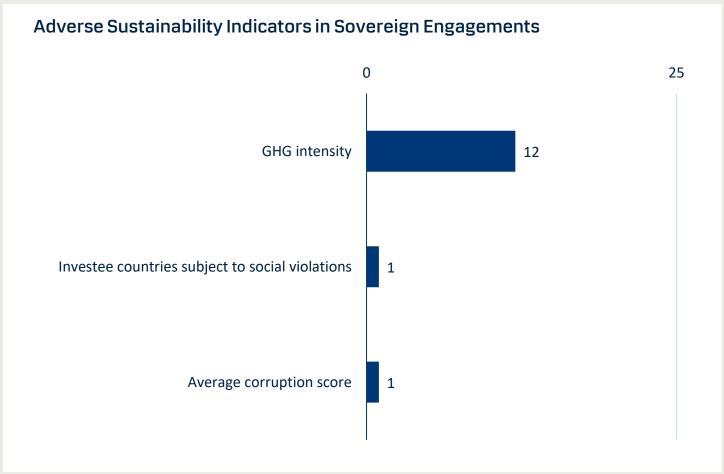


Principal Adverse Impact Monitoring and Reporting Scope for Sovereigns and Supranationals

Overview of engagement interactions that are assessed to be related to the indicators that are within scope for Danske Invest's principal adverse impact monitoring and reporting

Environmental, Social, Governance and Human Rights Indicators

- Indicator 15. GHG intensity
- Indicator 16. Investee countries subject to social violations
- Indicator 22. Average corruption score
- Indicator 23. Non-cooperative tax jurisdictions
- Indicator 24. Average rule of law score



Part 2 Voting

Introduction to Voting



The general meetings of companies are an opportunity to voice our opinion, vote on issues of key importance, and contribute to the good governance of the company. We seek to vote on all shares held, under both passive and active strategies, while taking into account preconditions, resources, and the costs of exercising voting rights.



In adherence with our Active Ownership Policy, Danske's Voting Guidelines provide a guide of how Danske Bank Asset Management anticipates voting on a given agenda item. The Guidelines are reviewed and updated on an annual basis to reflect market developments and to ensure that Danske's commitments are duly integrated into our voting approach. As enshrined in Danske Invest's Active Ownership Policy, voting must always be carried out for the benefit of the investors.



In order to ensure a structured and transparent process, records outlining our voting behaviour are made publicly available on our website.



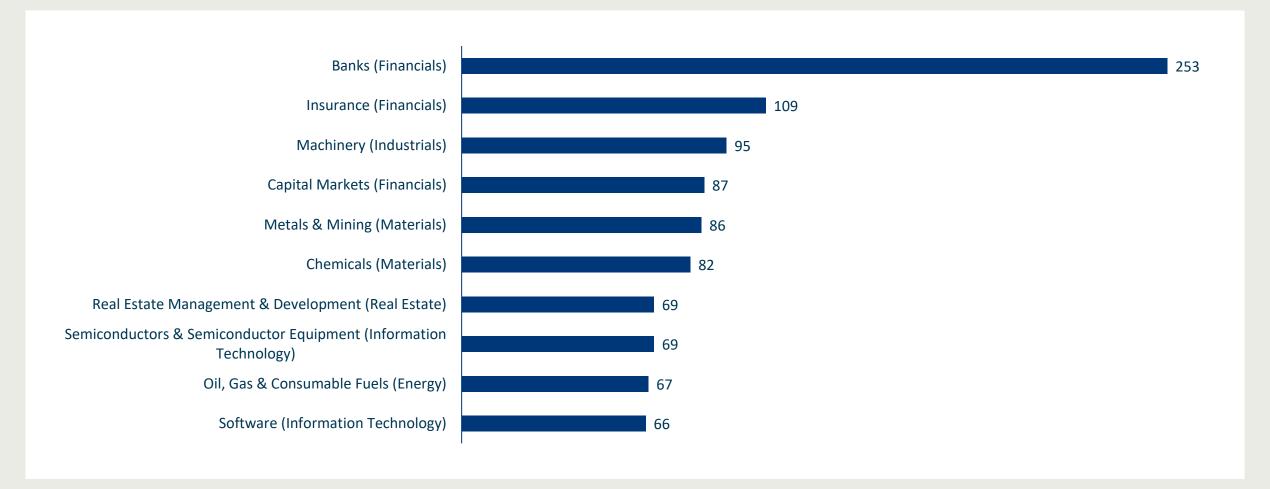
The breadth of voting activities in 2024 are represented below



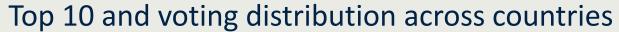


Top 10 industries most voted

Number of companies per industry (Sector in bracket)

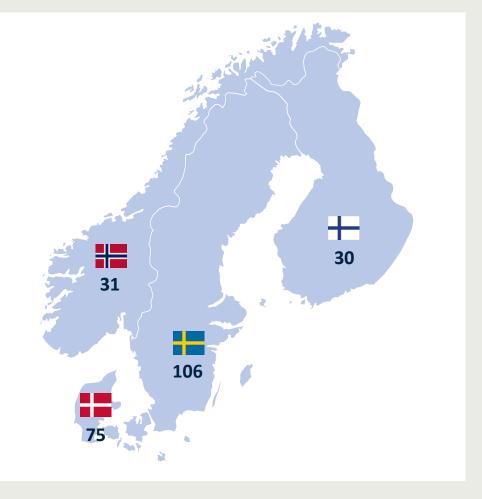






In 2024 we voted at the general meetings of 2,534 companies that were domiciled across 63 countries. The table provides insights on the top country domiciles

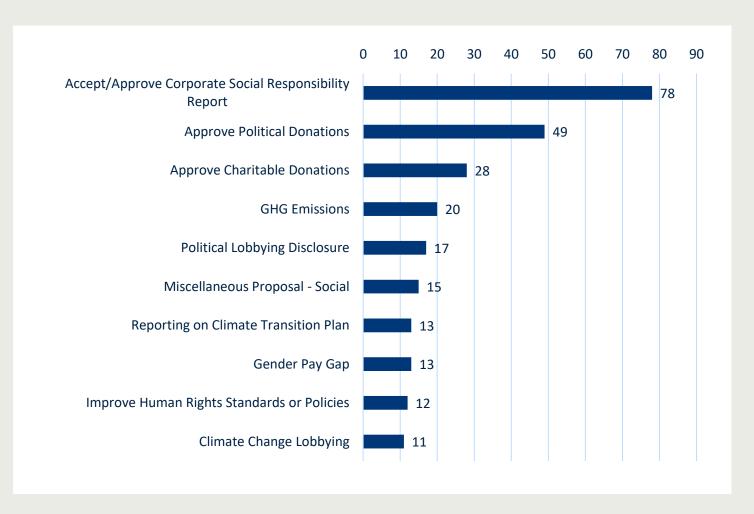
Rank	Country	Count of Companies
1	United States	663
2	Japan	206
3	China	141
4	India	107
5	Sweden	106
6	Germany	100
7	France	88
8	United Kingdom	84
9	Taiwan	78
10	Denmark	75



Most common Environmental & Social categorised proposal items voted 'For'

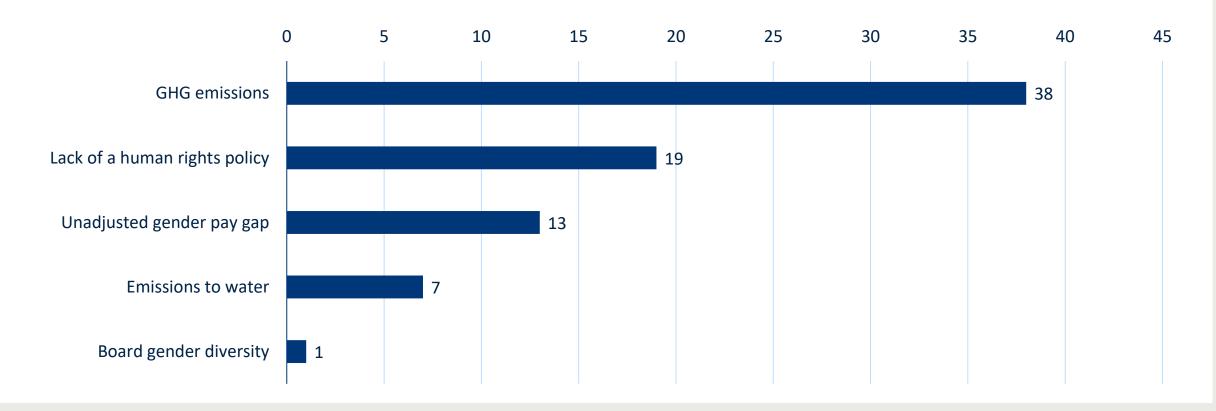
Observed Trends

There were 587 environmental & social categorised proposal items tabled during the 2024 season. The most common themes amongst these remained stable, with management proposals related to the approval of donations and non-financial information statements being the most prevalent. Climate-related proposals from shareholders were also common, often requesting increased disclosure and greenhouse gas emissions improvements. There was a rise in attention to biodiversity, climate and social issues. Biodiversity became a key concern, with proposals on responsible sourcing and construction near sensitive areas gaining traction. Climate initiatives expanded beyond oil and gas to industries such as steel and automotive, with increased scrutiny on corporate lobbying. Social issues like living wages and freedom of association appeared more frequently on meeting agendas across companies, reflecting the systemic concerns being raised. Additionally, AI governance emerged as topic for boards to consider, urging companies to be transparent about risks related to its use.



In 2024, we have voted in support of proposals linked to Adverse Sustainability Indicators





^{1.} See p. 13 for reference

More information on our voting activities?

View Danske Invest's votes

On our voting platform, we continuously disclose how we vote at the general meetings of holdings of significance

View Danske Invest's active ownership policy

Our active ownership policy sets out the principles guiding our voting scope through which we identify holdings of significance to vote on

View Danske's voting guidelines

The voting guidelines sets out a number of principles that guide the votes cast at general meetings

Voting explained

Danske Invest uses our voting rights to voice our opinion at the general meetings of companies we invest in. Through the delegation of the exercise of voting rights to Danske Bank Asset Management, who votes either for or against proposals with the purpose of supporting companies in long-term value creation, the mitigation of sustainability-related risks and minimization of adverse impacts on society.

Danske Invest seeks to vote for all shares held. However, our voting activities may be constrained by preconditions, resources, and the costs of exercising voting rights. This notwithstanding, through the application of our voting scope we have identified the holdings of significance that we will always seek to vote on.

Voting is done on a variety of management and shareholder resolutions, of which the majority targets corporate governance issues required under local listing requirements. As a guide for our voting activities and demonstration of transparency of our anticipated voting behaviour in the coming voting season Danske has developed Voting Guidelines. The Guidelines are maintained and updated on an annual basis.

Our proxy advisor supports us with

- Notices of general meetings and comprehensive information about the companies, the voting items on the agenda and voting recommendations,
- Voting recommendations based upon the Danske's Voting Guidelines.

Before voting, an assessment of the recommendations received from the proxy advisor is conducted under Danske's Bank's Voting Guidelines and market standards. Voting is also conducted on proposals not specifically addressed by the Voting Guidelines, in which case a proposal's likelihood of enhancing the long-term financial return or profitability of the company or maximizing long-term shareholder value is evaluated.

Part 3 Collaborative Engagements

Collaborative Engagements introduction



When appropriate, Danske Bank Asset Management on behalf of Danske Invest, collaborates with peers, like-minded investors and other relevant parties to exercise Active Ownership by engaging through joint dialogue and contributing collectively in respect to governance and sustainability dimensions. It might be appropriate to raise the issue with others in instances where individual engagement may have proven to be unsuccessful.



Through Danske Bank Asset Management, Danske Invest participates in investor initiatives to encourage increased transparency and sustainability standards in companies and financial markets.



Cooperating with other stakeholders is not subject to any frequency targets and can be done on an ad-hoc basis or through formal investor networks or membership forums. Danske Invest's participation in collaborative engagements must always respect and comply with applicable competition laws, and the Group's internal policies and guidelines relating to this.



Further information on our approach and governance of participation in collaborative initiatives is available in our Active Ownership Policy.



Read more about the collaborative initiatives that we have joined

Find information



















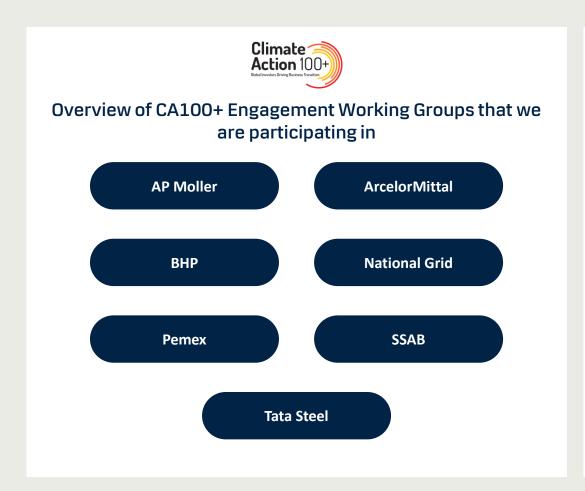




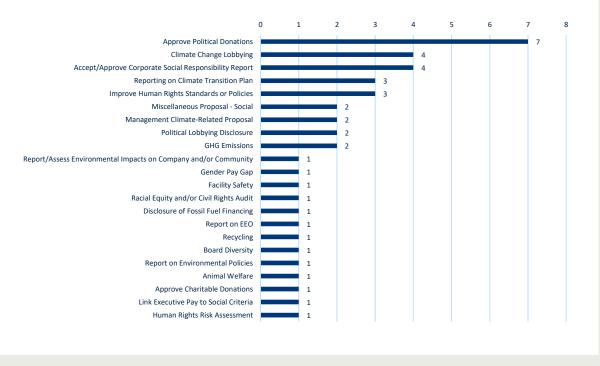


Overview of involvement in Climate Action 100+ activities

Climate Action 100+ (CA100+) is considered to be the largest ever global investor engagement initiative on climate change, which is focussed on the largest corporate greenhouse gas emitters. Further information is available in the link provided below¹



In 2024 we joined seven collaborative engagements organised under CA100+. In addition, we voted in favour of approximately 57% (42) environmental and social proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.

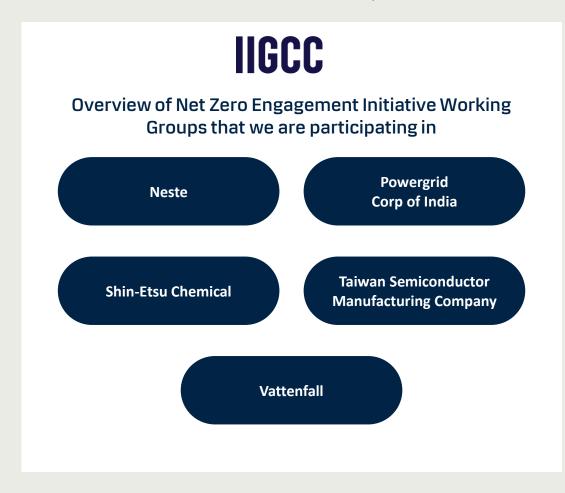


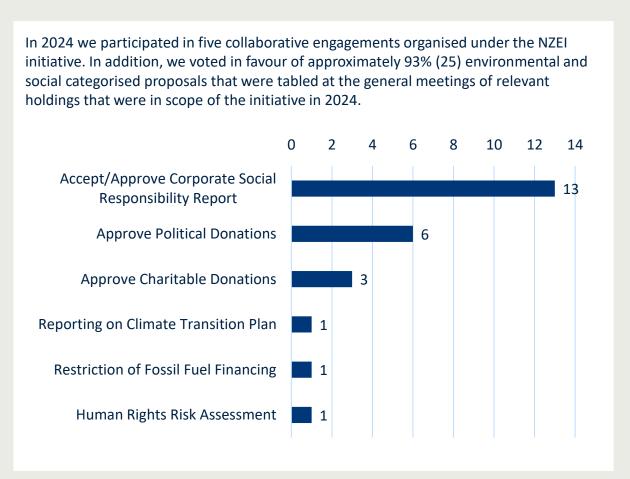
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1. climateaction100.org Danske Invest

Overview of involvement in Institutional Investors Group on Climate Change Net Zero Engagement Initiative

The Net Zero Engagement Initiative (NZEI) is an investor led initiative aimed at aligning investment portfolios with a net zero pathway using corporate engagement. It focuses on major emitters beyond the Climate Action 100+ focus list. Further information is available in the link provided below¹





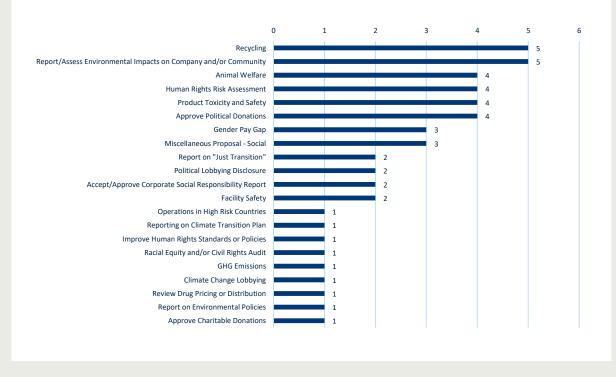
1. ijgcc.org/net-zero-engagement-initiative Danske Invest

Overview of involvement in Nature Action 100

Nature Action 100 is a global investor-led engagement initiative focused on supporting greater corporate ambition and action to reverse nature and biodiversity loss. Further information is available in the link provided below¹



In 2024 we participated in three collaborative engagements organised under Nature Action 100. In addition, we voted in favour of approximately 53% (49) of environmental and social categorized proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.

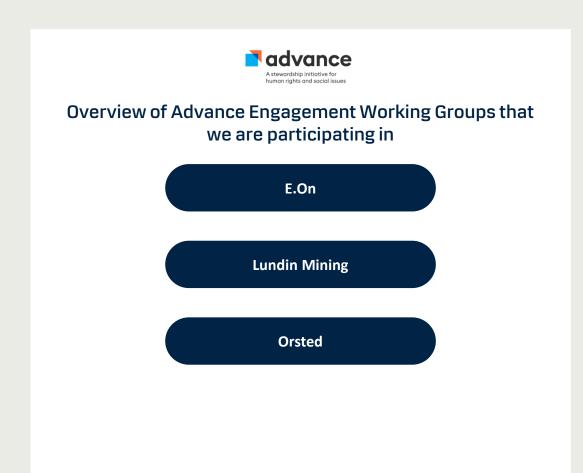


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1. natureaction100.org Danske Invest

Overview of involvement in Principles for Responsible Investment's Advance activities

Advance is a PRI-led collaborative initiative where institutional investors aim to protect and enhance risk-adjusted returns by advancing progress on human rights through investor stewardship. Further information is available in the link provided below¹



In 2024 we participated in three collaborative engagements organised under PRI's Advance engagement initiative. In addition, we voted in favour of all nine environmental and social proposals that were tabled at the general meetings of relevant holdings that were in scope of the initiative in 2024.



1. unpri.org/investment-tools/stewardship/advance Danske Invest

Overview of involvement in FAIRR's collaborative engagement working groups

The FAIRR Initiative (FAIRR) is a collaborative investor network that raises awareness of the material risks and opportunities in the global food sector. Further information is available in the link provided below¹



Biodiversity Loss from Waste & Pollution

Find information

Unpacking Labour Risk in Global Meat Supply Chains

Find information

Managing Biodiversity & Climate risks in Aquafeed

Find information



1. FAIRR.com

Disclaimer & contact information

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