

Group standard for responsible investments

Issued by Chief Executive Officer, valid from 6th of July 2018.

Purpose

The standard shall ensure that DNB does not contribute to the infringement of human or labour rights, corruption, serious environmental harm or other actions that could be regarded as unethical.

Scope

The standard applies to all companies in the DNB Group, including the Group's international operations. In the event of any inconsistencies, laws and other relevant external rules will take precedence over the governing document. The owner of the document shall be notified of such inconsistencies.

The governing document does not apply to:

- companies in which DNB has no controlling interest, as defined in the Norwegian Limited Liability Companies Act,
- companies which DNB has acquired for temporary ownership, and
- companies which DNB owns jointly with other financial institutions.

The standard is based on the governance principles for corporate responsibility.

Principles

1. Exclusions

Companies will be excluded from the investment universe if they themselves or through the entities they control:

- produce weapons*) which through normal use violate basic humanitarian principles,
- produces tobacco, or
- produce pornography

Mining companies and power producers which themselves or through entities they control derive 30 per cent or more of their income from thermal coal, or base 30 per cent or more of their operations on thermal coal, may be excluded from the investment universe. In addition, emphasis shall be placed on forward-looking assessments of the companies, including any plans to reduce the share of their income or operations derived from thermal coal and/or increase the share of their income or operations derived from renewable energy sources.

Companies may be excluded from the investment universe if there is an unacceptable risk that a company contributes to or is responsible for:

- serious or systematic violations of human rights, such as murder, torture, deprivation of liberty, forced labour, the worst types of child labour **
- and other exploitation of children
- grave violations of individual rights in wars or conflict situations
- serious violations of basic labour rights
- grave harm to the environment
- acts or omissions that on an aggregate company level lead to unacceptable greenhouse gas emissions
- serious corruption
- other particularly critical violations of basic ethical norms

DNB will not invest in government/sovereign bonds from countries subject to sanctions imposed by the UN Security Council.

2. Exercise of ownership rights

Engagement with companies and the exercise of ownership rights shall be based on the UN Global Compact and the OECD Guidelines for Multinational Enterprises, and be consistent with the United Nations Guiding Principles on Business and Human Rights.

DNB Asset Management is responsible for exercising ownership rights through dialogue, meetings and other measures. DNB Asset Management will seek to influence companies positively, and in cases where companies are suspected of acting contrary to the ethical investment guidelines of DNB and internationally recognised standards and conventions, encourage them to correct their actions.

3. External management

External management means management of customer assets outside DNB through various mutual funds and asset management companies.

The selection of external suppliers is based on an evaluation of whether the supplier's guidelines and implementation thereof are in line with DNB's own guidelines for responsible investments.

DNB shall not itself invest in external funds which include companies which themselves or through units they control produce weapons which during normal use breach fundamental humanitarian principles.

With respect to the investment services discretionary management and investment advice, only external funds which meet the requirements in the previous paragraph will be used. Customers who enter into agreements on discretionary management or

investment advice may nevertheless ask that their portfolio be exempt from this restriction.

DNB normally screens external funds and labels them based on the findings of the screening. In cases where it has not been possible to carry out screening, this will be clearly stated. With respect to funds which are used in the investment services discretionary management and investment advice, DNB will have an active dialogue with fund managers that have companies in their mutual funds which DNB itself has excluded from its investment universe. The aim is to influence the funds to adopt a more sustainable and responsible investment practice.

4. Responsible Investment Committee

A special committee has been established in DNB to administer and follow up the approved responsible investment guidelines throughout the DNB Group. The head of Corporate Responsibility and Public Affairs chairs the committee, which has group-wide responsibility for coordinating ethical aspects of the Group's investment activities.

The committee collects information about companies and makes sure that matters are as well elucidated as possible before issuing a recommendation regarding a possible exclusion of companies from the investment portfolio. The committee issues such recommendations to the heads of Asset Management, Group Investments and DNB Livsforsikring ASA, who serve as decision-makers for their respective units.

The committee will regularly consider whether the grounds for excluding a company still exist. Based on new information, the committee may recommend that the decision to exclude a company be revoked.

The committee will be regularly updated on DNB's exercise of ownership rights. In cases where these efforts are unsuccessful, the committee may recommend the exclusion of the relevant company.

The committee reports to the group executive vice president, Media & Marketing once a year.

5. Publication

A list of the number of companies excluded from the investment portfolio, according to exclusion criteria, shall be publicly available and regularly updated.

DNB will be open about the subjects the Group focuses on in its exercise of ownership rights. DNB will also make available voting records from general meetings when voting against the Board of Directors' recommendation. In addition, DNB will disclose voting records in matters of public interest or of particular interest to the

fund unit holders.

Roles and responsibilities

- The executive vice president, Corporate Responsibility and Public Affairs is the premise provider.
- All group executive vice presidents have executing responsibility.
- Compliance shall be monitored according to the three lines of defence.
- All managers are responsible for reporting non-compliance with the principles in the policy.

* DNB shall not invest in companies that are involved in anti-personnel mines and cluster munitions, as described in the Anti-Personnel Mine Ban Convention and the Convention on Cluster Munitions, or in companies that develop and produce key components for weapons of mass destruction. Weapons of mass destruction are defined as NBC weapons (nuclear or atomic, biological and chemical weapons).

** For a more detailed definition of "the worst types of child labour" cf. article 3 of the International Labour Organization (ILO) Convention no. 182.