



Policy
on Sustainability Considerations in Investments
for Skandinaviska Enskilda Banken AB (publ)

derived from the Sustainability Policy for the SEB Group

adopted by Group Executive Sustainability Committee of
Skandinaviska Enskilda Banken AB (publ)
on 18 September 2025

Sustainable Banking

Sustainability Considerations in Investments

1 Introduction

- 1.1** Skandinaviska Enskilda Banken AB ("SEB") aims to have a comprehensive and competitive investment offering with sustainability risks and Sustainability Impacts integrated into investment processes and products.
- 1.2** This Policy on Sustainability Considerations in Investments (the "Policy") is part of SEB Group's sustainability policy framework, which includes SEB Group's Sustainability Policy, thematic policies and sector policies. It has been developed to support business- and investment decisions in alignment with SEB Group's Sustainability Policy, risk appetite framework and long-term strategy.
- 1.3** Customers of SEB can, within the investment offering, choose to make investment decisions themselves, or they can mandate SEB to make investment decisions on their behalf. The methods for integrating sustainability risks and Sustainability Impacts are adapted to various activities of the investment offering.
- 1.4** This Policy, together with the document "*Disclosures on the integration of sustainability risk and consideration of adverse impact on sustainability factors in investment decisions and investment advice for Skandinaviska Enskilda Banken AB*" (available on SEB Group's website) provides information about integration of sustainability risk and Sustainability Impact in investment decisions at SEB. Decision-making processes to ensure that potential impacts on financial returns are adequately considered and managed are further guided by the internal document *Instruction for ESG Risk Management for the SEB Group*.

2 Purpose

The purpose of this Policy is to support business and investment decisions when integrating sustainability risks and Sustainability Impacts into investment processes, and products distributed by SEB.

3 Scope

- 3.1** This Policy applies to investment activities in the following two categories at SEB:
- i. When customers of SEB make investment decisions on marketed execution-only investment products or are provided investment or insurance advice, and

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- ii. When SEB makes investment decisions for customers within discretionary portfolio management or act as a product manufacturer for certificates.

3.2 This Policy shall be supplemented by instructions and guiding documents within relevant business areas.

4 Definitions

Direct Investments – Investments in equities, bonds and certificates

Investment Product – an UCITs as defined in Directive 2009/65 or an Alternative Investment Fund (AIF) as defined in Directive 2011/61/EU art. 4.

Investment Product Provider – an entity that manufactures and manages Investment Products.

PAI – Principle Adverse Impact.

PRI – the Principles for Responsible Investment.

Marketed Execution-only Products - Investment Products marketed to clients.

SEB – Skandinaviska Enskilda Banken AB (publ), not including subsidiaries.

SEB Group – Skandinaviska Enskilda Banken AB (publ) and its subsidiaries, branches, and representative offices. Foundations related to SEB Group are not part of SEB Group.

SFDR – Sustainable Finance Disclosure Regulation.

Sustainability Impact – The effect the undertaking has or could have on the environment and people, including effects on their human rights, connected with its own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships¹.

Sustainability Risk – Sustainability risk is defined as the risk of any negative financial impact on investment value stemming from current or prospective impact of ESG factors.

¹ For a more extensive definition, please see ANNEX I to Commission Delegated Regulation (EU) 2023/2772 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards

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5 Integration of sustainability considerations in investment decisions

5.1 General on sustainability integration

5.1.1 SEB has the ambition to avoid causing or contributing to adverse social and environmental impacts through its own activities. Sustainability considerations are guided by the SEB Group Sustainability Policy, restrictions and requirements in SEB Group's thematic and sector policies (as listed in Annex A) and the Instruction for ESG Risk Management for SEB Group.

5.1.2 Considerations of Sustainability Risks and impacts are often interlinked in the investment decision-making process and are balanced alongside financial risk considerations. The specific investment context, including asset class, time horizon, and investment objectives, determines how these factors are weighed and integrated. This chapter describes the main sustainability considerations in different investment situations

5.2 Sustainability requirements for selection of Investment Products

5.2.1 The following sustainability requirements are used when selecting Investment Product Providers and Investment Products:

- i. Investment Product Providers shall:
 - Be UN PRI Signatories. As signatories, they commit to integrating ESG factors into their investment analysis, decision-making processes and active ownership practices and commit to report on their processes annually.
 - Comply with SFDR reporting requirements.
- ii. Investment Products are expected to:
 - Not invest in companies that are involved in the production of controversial weapons as outlined in the SEB Group Arms and Defence sector policy.
 - Have integration of Sustainability Risk in their investment decision-making processes.
 - Have pre-disclosure and periodic reporting documents that are published as required in SFDR.
 - Be classified as SFDR Article 8 or 9 (as per the Product Providers' designation) and consider at least one PAI factor.

5.2.2 Investment Products that are passively managed, or do not comply with the requirements above due to structural or technical reasons, may be approved

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if assessed, decided and documented by the relevant business area's sustainability governance body.

5.3 Sustainability considerations when the customer makes investment decisions

5.3.1 For Investment Products, the marketed universe for investment decisions is based on the requirements outlined in 5.2.

5.3.2 When providing investment advice where the customer makes the ultimate investment decision, sustainability considerations are integrated for both Investment Products and Direct Investments.

5.3.3 For the selection of Direct Investments, this is done in accordance with the SEB Target market model. The selected universe of recommended Direct Investments shall further exclude the following:

- Equities and bonds from issuers with insufficient governance structures, or that verifiably have failed to comply with international norms and standards and who have not shown clear goals and ongoing measures to address these issues.
- Bonds issued by countries that are in serious breach of fundamental social and political rights or that are sanctioned or embargoed by the UN, EU, USA, or UK.

5.3.4 Further selection criteria and sustainability considerations may apply in individual investment advisory situations.

5.4 Sustainability considerations when SEB makes investment decisions for customers

5.4.1 SEB makes investment decisions within the role as manufacturer of discretionary portfolios and certificates.

5.4.2 In addition to the requirements outlined in the selection of Investment Products and Direct Investments (see 5.2 and 5.3.3), further integration of sustainability considerations for Direct Investments include, but are not limited to, the following criteria:

- Business involvement restrictions and requirements related to fossil fuel activities, human rights violations, tobacco production, weapons production and gambling services as per defined thresholds.

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- An investment that poses an enhanced sustainability (environmental and social) risk as defined in one of the Principal Adverse Impacts listed in SFDR is analysed and may lead to the investment not being considered.
- Heightened operational Sustainability Risk that are identified at an aggregated level, and how the company manages those risks, are reviewed and informs the decision if the company can be considered to invest in.

5.4.3 The criteria apply where sustainability data with sufficient quality are available at reasonable effort.

6 Governance

6.1 The distribution strategy and product governance framework define which products may be marketed and distributed to different client segments. Sustainability considerations and adherence to the approaches outlined in section 5 are part of SEB's product governance framework. If a matter related to the approaches outlined in section 5 needs clarification, escalation or exemption, the related matter is handled or decided and documented by the relevant business area 's sustainability governance body.

6.2 The sustainability governance body should be mandated by the head of respective business area to take the responsibility as stated above. The sustainability governance body shall be staffed with members of sufficient seniority and sustainability competence, representing relevant aspects of the business areas' operations and should liaison and invite representatives from other business areas as and when required. A business area has the possibility to delegate decision mandate to the sustainability governance body of another business area when deemed appropriate. Such a decision should be made by the head of the business area delegating the mandate.

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Appendix A

SEB Group Thematic and Sector Policies

The following sustainability-related thematic and sector policies have been implemented as far as possible in this policy. For access to the most recent versions of the documents, please visit SEB Group's website.

Thematic Policies

- Environmental Policy
- Social and Human Rights Policy.

Sector Policies

- Agriculture, Fishing, Aquaculture and Animal Welfare
- Arms and Defence
- Electricity and Renewable Energy
- Forestry, Pulp & Paper and Timber
- Fossil Fuels
- Gambling
- Mining and Metals
- Real Estate and Construction
- Shipping
- Tobacco and Tobacco-Free Nicotine Products
- Transportation.