



Sector Policy on Mining and Metals for the SEB Group

derived from the Sustainability Policy for the SEB Group

adopted by the Risk and Capital Committee of the Board of Directors
of Skandinaviska Enskilda Banken AB (publ)
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Sustainable Banking

Sector Policy on Mining and Metals

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Sector Policy on Mining and Metals

1 Introduction

The Mining and Metals Sector plays an important role in the development of our economy and society. Many metals are key inputs for the economic transformation towards a low carbon society. However, the industry can also have some potentially negative environmental and human rights impacts, if not addressed correctly.

SEB Group has exposure to the Mining and Metals Sector. This Sector Policy has been developed to support business decisions to align with SEB Group's Sustainability Policy and risk appetite. This supports SEB Group's efforts to deliver according to its long-term strategy.

The policy aims to address key risks related to the Mining and Metals Sector, which are listed in Appendix A.

This Sector Policy builds on the principles defined in the thematic Environmental Policy and the Social and Human Rights Policy, which are part of the overall Sustainability policy framework in SEB Group. Sustainability related policies in SEB Group are reviewed annually.

2 Definitions

Biodiversity: The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems¹

Business Relationship: A commercial relationship SEB Group has with a legal entity based on a legal agreement.

Company: Legal corporate entity conducting business.

Conflict-Sensitive Areas: Areas in a state of armed conflict or fragile post-conflict as well as areas witnessing weak or non-existent governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.²

Dedicated Finance: Where the financing is channelled to a specified use of proceeds.

Deforestation: The conversion of forest to agricultural use, with the exception for agroforestry projects.³

¹ As defined by Convention on Biological Diversity.

² OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-Risk Areas.

³ Considering the Regulation (EU) 2023/1115 on deforestation-free products.

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Expectation: Refers to SEB Group policy application levels. SEB Group Expects large Companies to strive to adhere to Expectations stated in the Sector Policy.

Mining and Metals Sector: Companies directly involved in prospecting and exploration, mine construction, mineral and peat extraction and mine operation as owner or on-site operating service provider, processing of minerals, mine closure and reclamation, manufacture of basic metals.⁴

Mitigation Hierarchy: A method which provides guidance on how to limit the negative impact on Biodiversity as far as possible and includes the following sequential steps: “Avoid”, “Minimize”, “Restore”, and lastly “Offset”.⁵

Mountaintop Removal: Mountaintop Removal mining (MTR), also known as mountain top mining (MTM), is a practice where the tops of mountains are removed. The earth from the mountaintop is then moved into neighboring valleys.

New Project: A New Project or capacity expansion at an identified location where any new commercial, industrial or infrastructure undertaking is taking place or any existing undertaking that is undergoing material change in output or function, which may result in changes to the operation’s sustainability impacts.

Requirement: Refers to SEB Group policy application levels. SEB Group Requires Companies to comply with SEB Group’s position. Non-compliance Requires active decisions on SEB Group’s Business Relationship.

Restriction: Refers to SEB Group policy application levels. SEB Group avoids entering into or retaining Business Relationships with Companies that do not comply with the policy position.

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

Sensitive Environmental Areas: National parks and nature reserves, Land based Natura 2000 areas, UNESCO World Heritage sites, and Wetlands covered by the Ramsar Convention.

Transition Plan: A strategy that lays out the undertaking’s targets, actions and resources for its transition towards a low carbon economy in accordance with the Paris Agreement.

⁴ Subsectors under the following NACE sector codes: 07 – Mining of Metal Ores; 08 – Other mining and quarrying; 09.9 – Support activities for other mining and quarrying; 24 – Manufacture of basic metals. In case of conflict the policy takes precedent.

⁵ The Biodiversity Consultancy.

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3 Purpose

The purpose of this Sector Policy is to define SEB Group's position on Business Relationships with Companies involved in Mining and Metals activities.

4 Scope

4.1 Applicability within the SEB Group

This Policy applies to the SEB Group excluding SEB Asset Management Holding AB and its subsidiaries, and Gamla Livförsäkringsaktiebolaget SEB Trygg Liv, taking local rules into account where relevant.

Investment services are governed separately by the Policy on Sustainability Considerations in Investments for Skandinaviska Enskilda Banken AB, or equivalent policy adopted by each subsidiary within SEB Group.

Exempt activities

The following investment and ancillary services related to when the SEB Group invests and distributes investment products are exempt from this policy:

- 1) Holdings of securities that are a consequence of seized assets in the ordinary course of business,
- 2) Holding of financial instruments that are a consequence of SEB Group's client order facilitation,
- 3) Any activity that the SEB Group is obliged to provide due to law or regulation,
- 4) Trading in terms of market making and client order facilitation through the provision of liquidity in securities markets and related research activities. This includes related collateral management activities as well as financing of externally managed securities portfolios (provided the portfolios are diversified and the borrower itself is not covered by this policy),
- 5) Financial products where the employees in Companies in scope are the beneficiaries, e.g. occupational pension,
- 6) White labelled products, provided by SEB Group, but where other financial institutions provide the product to the customer.

4.2 Applicability to Business Relationships

This Sector Policy covers Companies with more than 15% of Company revenue from the Mining and Metals Sector, calculated at SEB Group global limit holder level.

All SEB Group sector policies have different applicability levels.

- Large companies: Restrictions, Requirements and Expectations apply,
- SMEs: Only Restrictions and Requirements apply,

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- Sector Policies do not apply to Retail Companies but act as a guide.

For more details on policy application levels see Appendix B.

5 General

5.1 General Requirements

SEB Group Requires Companies to ensure that their activities do not result in material negative impact on Sensitive Environmental Areas.⁶

6 Mining

6.1 Restrictions

SEB Group avoids Business Relationships with Companies that have reported involvement in any of the following:

- Activities in violation of EU Conflict Mineral regulation,
- Mountaintop Removal,
- Riverine tailings disposal (rivers and streams used for disposal activities) or sub-marine tailings disposal (submerged pipes used for disposal in the sea).

Peat extraction

- SEB Group avoids new Business Relationships with Companies that are involved in peat extraction,
- SEB Group avoids providing Dedicated Finance of New Projects to peat fields.

6.2 Requirements

For Dedicated Finance of New Projects SEB Group Requires projects to:

- Where applicable, have an Environmental Impact Assessment (EIA),⁷
- Conduct a public consultation during the authorisation process,
- In case of negative Biodiversity impact/conversion of natural habitats, apply the Mitigation Hierarchy.

⁶ If an activity is approved by an official legal/licensing body within the EU, EEA, Switzerland or UK, the activity is not considered having material negative impact. If outside these geographical areas, mitigating actions taken which result in non-material negative impact must be shown, for example via an independent Environmental Impact Assessment.

⁷ As per the scope in the EIA Directive (85/337/EEC). Outside the EU, ensure the EIA is conducted in line with international good practice, e.g. IFC Performance Standards/Equator Principles.

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- In case of physical or economic resettlement outside High-Income OECD Countries: Policies in order to appropriately acknowledge, compensate and respond to community priorities,⁸
- In case of activities conducted in areas with indigenous peoples: Apply free, prior and informed consent (FPIC) principles to ensure the rights of indigenous peoples.⁹

6.3 Expectations

SEB Group Expects Companies to adopt and follow internationally accepted voluntary sector initiatives and standards wherever they are applicable, such as:

- Kimberley Process Certification Scheme for diamond mining,
- International Cyanide Management Code for gold mining,
- Extractive Industries Transparency Initiative (EITI),
- The member requirements of the International Council on Mining and Metals framework (ICMM).

In addition, SEB Group Expects Companies to:

- Have an environmental management system including material environmental impacts such as:¹⁰
 - o Land conversion strategy to limit sustainability impact,
 - o Water management plan, in and around mine sites,¹¹
 - o Mining waste disposal management plan,
 - o Responsible and risk-based management for tailings disposal and storage facilities (dams) according to international standards,¹²
 - o Renewable energies in e.g. production or transportation processes,
 - o Minimizing visual, noise and vibration impact from vehicle engines and power generation as well as air emissions such as dust or gaseous emissions,
 - o Emergency response plan.
 - o Financially secured mine closure and reclamation plan.

⁸ International Finance Corporation's Performance Standard on Land Acquisition and Involuntary Resettlement, or similar.

⁹ For guidance on FPIC see International Finance Corporation (IFC) Performance Standard 7 on Indigenous Peoples

¹⁰ An environmental management system is a set of processes and tools that enable a Company to manage its environmental responsibilities. For example, ISO 14001 or similar and for new projects: ISO 20887:2020 or similar standards.

¹¹ Such as: impact on water stressed areas and measure water intensity as well as measure the amount of discharged wastewater and set targets for its reuse and recycling.

¹² The Global Tailings Review "Global Industry Standard on Tailings Management" (2020).

7 Metals

7.1 Requirements

For Dedicated Finance of New Projects SEB Group Requires projects to:

- Where applicable, have an Environmental Impact Assessment (EIA),¹³

Aluminium

- Invest in secondary/recycled aluminum production if technically, economically and geographically feasible, or
- Invest in primary/new aluminum production aligned with the EU Taxonomy criteria.

Iron and Steel

- For Iron Ore steel making, apply low carbon technology alternatives, e.g. green hydrogen, CCS etc.,
- For Electric Arc Furnace (EAF) steel making, comply with the minimum steel scrap input relative to EAF high alloy steel (70%) and/or EAF carbon steel (90%) as stated in the latest EU Taxonomy.

7.2 Expectations

SEB Group Expects Companies to:

- Apply Best Available Techniques (BAT),¹⁴
- Have an environmental management system including material environmental impacts such as:
 - o Water management plan, in and around production sites,¹⁵
 - o Waste disposal management plan, including slags and hazardous waste,
 - o Minimizing visual, noise and vibration as well as air emissions such as dust or gaseous emissions,
 - o Emergency response plan and corresponding insurances in case of environmental or social accidents and crises situations.

¹³ As per the scope in the EIA Directive (85/337/EEC). Outside the EU, ensure the EIA is conducted in line with international good practice, e.g. IFC Performance Standards/Equator Principles.

¹⁴ Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries; Reference Document on Best Available Techniques for Energy Efficiency; Best Available Techniques (BAT) Reference Document for Iron and Steel Production. Integrated Pollution Prevention and Control (IPPC) - Reference Document on Best Available Techniques in the Ferrous Metals Processing Industry.

¹⁵ Such as: impact on water stressed areas and measure water intensity as well as measure the amount of discharged wastewater and set targets for its reuse and recycling.

8 General Expectations

SEB Group Expects Companies to:

- Develop a Transition Plan, including where relevant, Just Transition considerations.
- Identify potential adverse impact through direct drivers of Biodiversity loss and set relevant targets,¹⁶
- Have a process to ensure that – in case of identified negative Biodiversity impact or conversion of Natural Habitats – the Mitigation Hierarchy is applied,

SEB Group also Expects Companies to respect human rights as expressed in the United Nations Guiding Principles on Business and Human Rights through the implementation of the following:

- Human rights and labour rights policies including a Human Rights Due Diligence, HRDD,
- Health and safety policy based on industry safety guidance,¹⁷
- Established grievance and whistle blower mechanism,
- Active engagement in constructive partnerships with affected stakeholders

Additionally, SEB Group Expects Companies to maintain high standards of accountability and integrity regarding their business supported by:

- Sustainability report (annually published) or similar comprising, at a minimum, disclosure of overall climate impact as well as other material sustainability impact for own operation and relevant Business Relationships,
- Anti-corruption policy in proportion to the size and risk-exposure of the Company,
- Tax reporting according to country-by-country principle, when relevant,¹⁸
- Commitment to EITI (Extractive Industries Transparency Initiative) disclosure principles, when applicable.

¹⁶ Land/-Sea use change, Overexploitation of natural resources, Climate change, Pollution, and Invasive alien species. (In line with definition from IPBES).

¹⁷ E.g. World Bank Group Environmental, Health, and Safety Guidelines; ILO – Safety and health in forest work.

¹⁸ OECD/G20 BEPS Project (15 actions) – Action 13: Country-by-Country Reporting.

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Appendix A: Sustainability impact & risk factors (non-exhaustive lists)

Mining

- Marine and terrestrial habitat alteration with impacts on ecosystems and Biodiversity,
- Contamination of soils and water reserves (including stress and scarcity),
- Emissions, including GHG and other pollutants,¹⁹
- Toxic mine waste and chemical leakages caused by tailings and waste rock,
- Tailings dam failures,
- Health and safety of workers and nearby residents,
- Negative human rights impact from, for example, physical resettlement or using customary land from indigenous people etc.,
- Fueling conflict in Conflict-Sensitive Areas,
- Bribery and corruption.

Ferrous and non-ferrous metals

- Emissions, including GHG and other pollutants,
- Hazardous and solid waste,
- Water stress and pollution,
- Health and safety of workers and residents.

¹⁹ Fine or coarse particulate matter (PM2.5, PM10), volatile organic compounds (VOCs), NO_x, SO₂ or CO.

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Appendix B: Policy Application Levels

Table 1: SEB Group policy application to different sizes of Companies

	<i>Company size</i>		
<i>Application level:</i>	Retail Companies	SMEs	Large Companies
Restrictions	-	✓	✓
Requirements	-	✓	✓
Expectations	-	-	✓

✓ Applicable.

- Not applicable but can be used as guidance.

Note: Deviations from restrictions and requirements in this policy shall be handled according to established SEB Group internal processes.

Retail Companies is defined as counterparties where SEB Group's credit exposure is below EUR 1 million.

SMEs are defined as counterparties where SEB Group's credit exposure is above EUR 1 million and not defined as large companies. Note that the material share of revenue at SEB Group Global limit holder level still applies.

Large Companies are defined as counterparties that fulfil two or more of the following and have not been defined as non-material Business Relationships in the divisions:

- More than 250 employees
- Turnover above 50m EUR
- Balance sheet value above 43m EUR.