

PRINCIPAL ADVERSE SUSTAINABILITY IMPACTS STATEMENT

Financial market participant Luminor Asset Management IPAS, LEI 2549001Q0VO9QXXJHZ63
Summary Luminor Asset Management IPAS (LEI 2549001Q0VO9QXXJHZ63) (further in this document – LAM) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated principal adverse sustainability impacts statement of LAM (further – Statement).
Description of principal adverse sustainability impacts Not applicable. The first description of principal adverse sustainability impacts will retrospectively cover period from 1 st of January 2022 to 31 st of December 2022.
Description of policies to identify and prioritize principal adverse sustainability impacts Luminor group has approved following policies and guidelines with the purpose to help identify and prioritize principal adverse sustainability impacts in the business activities of its different divisions and subsidiaries: <u>Corporate Social Responsibility policy</u> - outlines main principles and Luminor Group AB and all its subsidiaries work in achieving sustainable economic, social, and environmental development in the areas and business sectors, where Luminor operates. In our investment process we aim to identify adverse sustainability impact from our investment decisions. We avoid direct investments in companies that do not meet our minimum safeguards. We aim to invest in companies and in funds managed by external asset managers that exhibit positive trend in integrating ESG factors in their businesses. This provides us opportunity to identify and prioritize investments with lower adverse sustainability impact. Starting with the first reference period of 01.01.2022 to 31.12.2022 we will be performing regular screening of our investments. In forthcoming Statements covering reference periods we will report on principal adverse impacts on sustainability factors' indicators as set out in Regulatory Technical Standards of the EU Regulation 2019/2088. Such reported measurements of principal adverse impacts might be partial and subjective, subject to available data and tools. We will seek to maximize quality by implementing internal processes to increase the confidence in measurements.
Engagement policies LAM has adopted Engagement policy in accordance with Article 3g of Directive 2007/36/EC of the European Parliament and of the Council. The Policy stipulates general principles whereby the exertion of the shareholder's rights should be included in the LAM's investment strategies and what engagement activities the LAM introduces on behalf of the pension plans by investing assets in the entities' shares. Policy established six general principles the latter shall try to generally observe in situations, where the LAM believes that it may influence the entities in whose shares it invests

As of the date of publication of this Statement, LAM does not invest directly in companies' shares on behalf of pension plans it manages.

Reference to international standards

LAM operates according to Luminor Bank AS group's Corporate Social Responsibility Policy supported by other relevant policies, guidelines and procedures. In addition, in our activities we follow the guidance provided by UN Principles of Responsible Investments (UN PRI) – regarding collective investment undertakings we invest only in financial instruments issued by investment managers who are signatories to UN PRI.

For our Article 8 (as defined in EU Regulation 2019/2088) pension funds, to assess principal adverse sustainability impacts and measure adverse sustainability indicators, we employ various scores provided by index administrators. Evaluation framework for such scores (e.g. ESG Controversies score) is designed to be consistent with international norms, e.g. represented by the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN global Compact.