

List of Signatures

Page 1/1



P-MI-20 01 - Responsible Investment Policy_07 05 2025_EXE C...

Name	Method	Signed at
Gitte Lillelund Bech	MitID	2025-05-09 09:59 GMT+02
Astrid Haug	MitID	2025-05-08 21:13 GMT+02
Henrik Parkhøi	MitID	2025-05-08 19:32 GMT+02
Peter Busk	MitID	2025-05-08 15:30 GMT+02
Jørgen Tang-Jensen	MitID	2025-05-08 14:45 GMT+02
Karsten Dybvad Dalsjö	MitID	2025-05-19 10:58 GMT+02
Kirsten Slot	MitID	2025-05-09 13:42 GMT+02



This file is sealed with a digital signature. The seal is a guarantee for the authenticity of the document.

External reference: D3BDA4CC26BF42A2AA8BE2E26FFFD55

Responsible Investment Policy

1. General approach

- 1.1 This policy ("Policy") outlines Fondsmæglerselskabet Maj Invest A/S' ("Maj Invest") approach to responsible investing. The Policy outlines Maj Invest's overall approach to responsible investment, ESG strategies, and the governance framework. Maj Invest aligns its responsible investment policy with governing principles for such policies in the UN-supported Principles for Responsible Investment (PRI).
- 1.2 The Policy applies to Maj Invest and its client relationship with mutual investment funds managed by Maj Invest, including Investeringsforeningen Maj Invest (Denmark), Maj Invest Funds (Luxembourg), Maj Invest Global Value Equities Fund, LP (US), Maj Invest Global Value Equities CIT (US), and for certain other discretionary mandates. For single client discretionary mandates and investment advisory mandates, a different scope or additional requirements may apply, such as specific exclusion criteria, and will be outlined in separate agreements or legal and governance obligations. More than 90 pct. of Maj Invest's asset under management is subject to the principles in the Policy. Investments in derivatives, global index funds, and ETFs are currently excluded due to data limitations. Maj Invest continues to explore ways to include such investment instruments under the policy. In the meantime, individual assessments may be conducted where relevant to help limit exposure to activities that conflict with the policy's principles.
- 1.3 In addition to this Policy, Maj Invest has other policies that outline the responsible investment approach. These include the Active Ownership Policy, the Policy on Integration of Sustainability Risks, the Conflicts of Interest Policy, the Whistleblower Policy, the Diversity and Inclusion Policy, Code of Ethics, and Statement on Principal Adverse Impacts (PAIs). Together, these policies and statements reflect Maj Invest's responsible investment practices. Maj Invest maintains internal procedures governing the implementation of policies and guidelines to ensure consistent and effective application across the organisation.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFB55

- 1.4 Maj Invest recognizes the importance of avoiding and managing conflicts of interest in relation to investment decision making. All investment activities are conducted in accordance with the Maj Invest Code of Ethics and Conflict of Interest Policy and underlying procedures.

2. Responsible Investment View

- 2.1 Maj Invest invests capital alongside clients', ensuring aligned interests and sustainable value creation. The investment strategies are built on fundamental bottom-up research, and as a firm, Maj Invest also emphasizes a deep understanding of global macroeconomics, financial markets and climate economics. Maj Invest strives for high long-term returns for clients, and aims to generate sustainable returns, while responsibly contributing to the well-being of society.
- 2.2 Maj Invest invests across various asset classes, including fixed income and listed equities, through a range of investment strategies. For some investment strategies, investments are not in portfolio companies but bonds, indexes or derivatives, where the approach may not apply. The integration of ESG factors is adapted to the specific characteristics of each strategy.
- 2.3 Maj Invest recognises the value of frameworks to help standardize and compare sustainability efforts. Maj Invest has been a signatory to the UN-supported Principles for Responsible Investment (PRI) since 2010, reflecting Maj Invest's commitment to integrating ESG factors into the investment practices. Maj Invest also recognises key international standards, including the UN Global Compact, the OECD Guidelines for Multi-national Enterprises, the Paris Agreement, and conventions on human rights, labour rights, the environment, and weapons. In addition, Maj Invest recognises the UN Sustainable Development Goals (SDGs) as a framework to assess how portfolio companies address sustainability challenges and uses where relevant.
- 2.4 Maj Invest prioritizes active ownership, where agreed with clients, to support positive change and protect long-term value for clients. Maj Invest has adopted an Active Ownership Policy available on the website.

3. Expectations and objectives

- 3.1 The Policy – together with Maj Invests other policies, guidelines and procedures – aims to reflect Maj Invest's approach to responsible investment. It aims to provide clarity, transparency and consistency on Maj Invest long-term value creation and effective



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

management of ESG risks and opportunities, and how expectations and interests of key stakeholders, including clients, beneficiaries, and society at large are met, e.g. how clients' investments are managed responsibly, with proper consideration of ESG factors.

4. ESG Investment Framework

4.1 Maj Invest recognises that different investment strategies benefit from different levels of ESG integration. In line with this, Maj Invest has adopted a ESG Investment Framework¹.

4.2 Within this framework, Maj Invest has defined three ESG approaches with increasing levels of ESG consideration: ESG Exclusion, ESG Integration, and ESG Focused. The depth of ESG considerations in the investment analysis increases gradually from the ESG exclusion strategy to the ESG Focused strategy, as illustrated in overview of ESG approaches and investment strategies on the Maj Invest website.

4.3 ESG Exclusion

The ESG Exclusion criteria are designed to avoid investments in activities that have significant negative impacts on society or that negatively affect the ESG focus of the specific investment strategy. Investment strategies following the ESG Exclusion approach integrate ESG risks through exclusions and considering alignment with international norms and standards. This ensures that ESG restrictions and guidelines are upheld, including verification of compliance with exclusion lists and correct implementation of applicable rules.

Maj Invest uses a set of minimum standards that apply across all investments covered by this Policy, as outlined in Section 5. Some investment strategies may apply more restrictive policies, and specific exclusion criteria may also be defined in agreement with clients.

The elements of the ESG Exclusion strategy form the baseline for integrating ESG considerations across investment strategies in Maj Invest.

¹ Using the principles of the Impact Management Project, coordinated by Bridges Fund Management.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

Listed Equities

For listed equity strategies, the approach includes a pre-investment screening of the portfolio company's revenue linked to excluded activities. The assessment is based on available data from the third-party provider, Sustainalytics. If data is missing, the investment team and the sustainability team conduct a manual assessment of the company's activities. The procedure for manual assessments is outlined in internal guidelines.

Furthermore, the approach includes, norms-based screening of portfolio companies to ensure alignment with widely accepted international standards on environmental, social, and governance issues. This screening is systematic and based on specific international conventions and guidelines relating to human rights, labour standards, the environment, and anti-corruption, such as, but not limited to, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Paris Agreement, and various human rights, labour rights, environmental, and weapons-related conventions. If companies are found to be breaching, or at risk of breaching, these standards, the third-party data provider, Sustainalytics, will initiate engagement on behalf of Maj Invest and other investors. If the engagement process does not lead to improvements, the company will be placed on Sustainalytics' disengagement list, and Maj Invest may choose to divest from the investment. For more details on engagement practices, please refer to Maj Invest's Active Ownership Policy, available on the website.

Unlisted equities

For unlisted strategies, the approach includes an early-stage pre-investment assessment of the company's activities to identify any involvement in excluded sectors. As third-party data is typically not available for unlisted investments, the assessment is carried out manually by the investment team and the sustainability team based on information collected during the due diligence process.

Fixed income

For sovereign bonds, Maj Invest applies a country risk rating based on data from the third-party provider Sustainalytics. This rating evaluates a country's national wealth using the World Bank's concept of capitals, combined with an assessment of ESG factors that reflect the country's ability to manage its wealth efficiently and sustainably. Sovereign bond issuances from countries classified as "severe risk" under this framework are excluded from all portfolios.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

4.4 ESG Integration

In addition to applying exclusion and norms-based screening principles under the ESG Exclusion strategy, investment strategies following the ESG Integration approach actively assess material ESG risks and opportunities as part of the investment decision-making process. The approach aims to identify and manage potential exposure to companies facing significant ESG risks. This means that aspects such as carbon footprint, resource use, working conditions, and regulatory factors are considered to understand their potential impact on a company's long-term value creation.

Listed equities

For listed equities, this assessment is based on ESG risk data received from the third-party provider, Sustainalytics, combined with the investment team's extensive knowledge of the companies in which they invest. The ESG risk data from Sustainalytics is based on 22 material topics and more than 140 underlying indicators, with a focus on financial materiality. The objective is to understand the ESG risks a company is exposed to and how these risks are being managed, in order to assess the company's overall positioning towards these risks. This assessment results in an aggregated ESG risk rating. The listed equity integration strategies aim to maintain an overall ESG risk rating that is lower than that of the relevant benchmark.

While the investment team primarily relies on raw data for analysis, investments in portfolio companies rated as "High Risk" or "Severe Risk" require further justification and a control check by the sustainability team. In such cases, the investment team documents an investment rationale, which may include an assessment of how the score is weighted, any steps the company has taken to improve its practices, or relevant insights not reflected in the third-party data.

Unlisted strategies

For unlisted investments, the availability of ESG-related data may be limited. Therefore, the assessment of ESG risks for new investments is based on information collected through due diligence, direct engagement with the company, and/or publicly available sources where relevant. The assessment process may be conducted by an external service provider, by co-investors, or internally by the investment team and sustainability team. The findings are documented in the company presentation prepared for the Investment Committee.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFBBD55

Fixed income

Integrating ESG into fixed income strategies are challenging due to limited data availability. For corporate bonds, ESG integration follows the same approach as for listed equities.

For mortgage bonds, the investment team assesses ESG integration based on the extent to which mortgage institutions have set concrete sustainability targets for the assets financed by the bonds. For example, this may include mortgage loans on real estate where the institution has established targets related to the energy efficiency of the properties.

4.5 ESG Focus

ESG Focused strategies invest specifically in portfolio companies and sectors that contribute to addressing defined sustainability challenges, with a particular focus on themes such as climate and environment, diversity and inclusion, and well-being. In these strategies, ESG is not only part of the overall risk assessment but also a core element of the investment focus.

In addition to traditional financial analysis, the approach includes identifying the thematic relevance based on the specific ESG focus of the strategy. This involves selecting portfolio companies/investments with the potential to outperform by aligning with long-term sustainability trends, such as the green transition. Strategies under this approach also applies the principles of both the ESG Exclusion and ESG Integration strategies.

Listed equities

For listed equity strategies under the ESG Focused approach, the investment team assesses how each investment contributes to the specific ESG focus of the strategy prior to making an investment decision. This assessment uses strategy-specific indicators, such as contribution to the SDGs, revenue or capital expenditure alignment with the EU Taxonomy, and carbon reduction initiatives. The evaluation is based on data from third-party providers, Sustainalytics and Clarity AI. If data is missing, the investment team and the sustainability team conduct a manual assessment. The approach for our manual assessments is described in our internal procedures.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

Fixed income

For ESG Focused fixed income strategy, Maj Invest assesses how the proceeds from the debt instrument are allocated. This is particularly relevant to the green bond strategy², where the ESG focus is on climate and environmental improvements.

When investing in green bonds, the investment team ensures compliance with recognized best practices, such as the ICMA Green Bond Principles or the EU Green Bond Standard. Additionally, the bond must have a second-party opinion to verify its environmental credentials.

5. Minimum standards

5.1 Maj Invest applies a set of exclusions that serve as a minimum standard across all investment strategies. These exclusions apply to investments whose activities conflict with Maj Invests core ESG priorities, specifically those generating revenue from activities known to have major negative societal or environmental impacts, as outlined below. Investments in derivatives, global index funds, and ETFs are not covered by this policy due to data limitations and are therefore not subject to the minimum standards. Maj Invest is investigating ways to expand coverage to these instruments. This may include the use of manual assessments where possible, to help limit exposure to activities that conflict with the minimum standards.

5.2 Convention-covered weapons

Maj Invest excludes investments in companies or bonds issued by companies involved with convention-covered weapons. Convention-covered weapons include portfolio companies in the development, production, or maintenance of cluster munitions, anti-personnel mines, chemical and biological weapons, as well as nuclear weapons outside the Non-Proliferation Treaty (NPT).

5.3 Tobacco production

Maj Invest excludes companies or bonds issued by companies generating more than 10 pct. revenue from the cultivation and manufacturing of tobacco products. This

² A green bond is a type of fixed-income instrument used to finance or refinance projects with positive environmental or climate impacts.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

includes businesses engaged in producing cigarettes, cigars, chewing tobacco, and other related products containing tobacco.

5.4 Adult entertainment

Maj Invest excludes investment in companies or bonds issued by companies generating more than 10 pct. of revenue from the production of adult entertainment, which includes portfolio companies involved in creating explicit content intended for adult audiences due to potential issues with exploitation, labour practices, and other societal impacts.

5.5 Thermal Coal

Maj Invest excludes companies or bonds issued by companies generating more than 10 pct. of revenue from thermal coal extraction, which covers both the mining and exploration, due to this being a major source of CO2 emissions.

5.6 Oil Sands

Maj Invest excludes companies or bonds issued by companies generating more than 10 pct. of revenue from oil sands extraction, which includes both mining and exploration, due to the high environmental impact of these activities.

6. **Third-party data providers**

6.1 Maj Invest uses raw data from several third-party providers to support the integration of ESG considerations across listed investment strategies. These data sources are essential for conducting exclusionary screenings, norms-based screenings, ESG risk assessments, sustainability contributions and identifying controversies and engagement needs. For these purposes, Maj Invest primarily relies on the following data providers:

- **Sustainalytics:** For product involvement, norms-based screening, ESG risk ratings and underlying indicators, controversies, and engagement data.
- **Clarity AI:** For SDG data, PAI indicators, and EU Taxonomy alignment.
- **ISS:** For proxy voting and voting advisory services.
- **ComplyAdvantage:** For sanction screening.

6.2 The methodologies and data sources used by these providers involve certain limitations, including inconsistent corporate reporting, limited data availability in specific sectors or regions, and reliance on estimated data where reported figures are not available. Maj Invest combines acknowledged data providers with the investment team's in-



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

depth knowledge of the portfolio companies, and ongoing monitoring and validation of data quality from recognised providers.

7. Active Ownership

- 7.1 Active ownership is an integral part of Maj Invest's responsible investment approach and is exercised through both engagement and voting activities to create long-term value creation and promote responsible business practices.
- 7.2 The objectives of Maj Invest's engagement activities are to mitigate ESG-related risks that may affect financial returns and address sustainability issues across all PAIs effectively.
- 7.3 Reference is made to Maj Invest's Active Ownership Policy, which outlines the detailed approach to engagement, voting, prioritisation of activities, and reporting. The policy is available on the website.

8. Monitoring, reporting, infringement and revision

- 8.1 Maj Invest reports at the organisational level under the PRI framework and at fund level under the EU Taxonomy and SFDR on an annual basis. Maj Invest is committed to provide reporting on activities, progress, and outcomes across our different investment strategies through the website and in annual reports.
- 8.2 Responsibility for compliance with this Policy is held by the Executive Board of Maj Invest.
- 8.3 In event of significant non-compliance with the Policy, the Executive Board must notify (i) the Board of Directors by no later than the next meeting of the Board of Directors, and furthermore (ii) the Chairman of the Board of Directors without undue delay, unless a shorter deadline is specified in the Policy or in legislation. In collaboration with the Board of Directors and without undue delay, the Executive Board must take the measures necessary to ensure that the Policy is complied with once again.
- 8.4 This Policy must be kept updated because of legislative amendments, guidelines from the Danish FSA or other conditions that make updating necessary.
- 8.5 The Policy is revised annually by the Executive Board, or as required in case of significant changes in the underlying assumptions and is approved by the Board of Directors.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55

- 8.6 The Executive Board is responsible for ensuring that the current Policy at any time is available to the company's employees.

9. Entry into force

This Policy will enter into force upon its approval and signing by the Board of Directors at the Board Meeting May 7, 2025.

Approved by the board on May 7, 2025

Chairman
Henrik Parkhøi

Board Member
Gitte Lillelund Bech

Board Member
Karsten Dybvad

Board Member
Jørgen Tang-Jensen

Board Member
Astrid Haug

Board Member
Kirsten Slot

Board Member
Peter Busk



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
D3BDA4CC26BF42A2AA8BE2E26FFFD55