

Description of the Implementation of Active Ownership 2024

Fondsmæglerselskabet Maj Invest A/S (“Maj Invest”) is a MIFID investment firm primarily engaged in portfolio management and offering investment advice to clients without providing custodial services. Any investments made by Maj Invest on behalf of clients are always registered and deposited with the clients’ custodian. Thus, Maj Invest is not an “intermediary” as defined in EU-directive 2017/828 of 17 May 2017 Shareholder Rights Directive II (“SRD II”), art. 2(d), as also implemented into Danish regulation, and is therefore not covered by obligations for these entities including facilitation of the exercise of shareholder rights.

In accordance with SRD II, Article 3g(1)(b) and (2), and as implemented in the Danish Act on Investment Firms, Investment Services, and Activities (FIA § 49), Maj Invest qualifies as an “asset manager” (as defined in SRD II, Article 2(f) and implemented into Danish regulation). As such, Maj Invest is obligated to develop and publicly disclose an engagement policy. This includes detailing how the policy has been implemented, providing a general description of voting behavior, explaining the most significant votes, disclosing the use of proxy advisors, and reporting on how Maj Invest has cast votes at general meetings of companies in which it holds shares.

Maj Invest has published a Voting Policy and a Responsible Investment Policy on its website, outlining its approach to active ownership practices. These policies apply to Investeringsforeningen Maj Invest, Maj Invest Funds, Maj Invest Global Value Equities Fund, LP, Maj Invest Global Value Equities CIT, as well as other selected discretionary mandates. For discretionary mandates, clients may have specific legal or governance requirements, resulting in tailored voting setups or additional requirements.

Implementation of policy

Maj Invest’s approach to the exercise of voting rights for clients depends on and is in accordance with the agreement with the client in question. Agreements with clients are individual and not necessarily identical. The voting approach thus may include the following scenarios:

- **Discretionary Voting:** In some cases, Maj Invest has the discretion to vote on behalf of the client
- **Mandatory Voting:** In other cases, Maj Invest is obligated to vote in accordance with client instruction.
- **No Voting:** Certain agreements explicitly exclude voting on behalf of the client.

As a result, Maj Invest evaluates voting decisions on a case-by-case basis, ensuring alignment with client agreements and interests.

During the year, Maj Invest conducted voting activities in accordance with its Voting Policy. Discretionary voting was applied for all clients where this was agreed upon. For these clients, voting rights were exercised at 95% of all general meetings during 2024, which is deemed satisfactory. Additionally, the implementation of the Active Ownership Policy resulted in Maj Invest voting against management at 36% of the votable proposals.

For Investeringsforeningen Maj Invest, a non-voting approach was taken due to various investment strategies and in accordance with Investeringsforeningen Maj Invest's separate voting policy, which required Maj Invest to vote only on matters of some economic relevance—none of which arose in 2024. However, this policy was aligned with Maj Invest's Active Ownership Policy during 2024, and Maj Invest will, as a general rule, exercise voting rights on behalf of Investeringsforeningen Maj Invest starting in 2025.

Maj Invest also conducted engagement activities in accordance with its Responsible Investment Policy. The Maj Invest Danish Equities Team engaged in several dialogues with companies on environmental, social, and governance (ESG) topics. In total, the team held 28 dialogues with companies within its investment universe. These engagements typically addressed less severe cases related to strategic adjustments or potential concerns about specific activities that posed risks to the portfolio.

Additionally, Maj Invest engaged with companies through the third-party data provider Sustainalytics. Sustainalytics initiates engagement with companies that breach or are at risk of breaching international norms, such as the UN Global Compact or OECD Guidelines. Sustainalytics assesses the measures taken by these companies to address the identified issues. If the engagement process does not result in meaningful behavioral changes, the company is placed on Sustainalytics' Disengage List, and Maj Invest may subsequently divest from the investment. During 2024, Sustainalytics engaged with 28 companies on 33 cases on behalf of Maj Invest.

Use of proxy advisors

Maj Invest utilizes the analysis firm ISS Governance for managing and executing voting activities. The ISS platform is used to monitor meetings and review research to ensure that voting aligns with Maj Invest's Voting Policy.

For discretionary voting activities, Maj Invest reviews proxy voting recommendations

provided by ISS Governance. If ISS recommendations do not align with management's proposals, the investment teams make the final decision. All potential conflicts of interest were assessed, and no conflicts were identified during the year.

Significant votes

Maj Invest has established its own criteria for determining which votes are deemed significant. These criteria are based on the size of the capital share in the respective company as well as the topic of the vote.

The focus is on votes in companies where:

- Maj Invest owns more than 2% of the share capital.
- A single stock represents more than 5% of the portfolio's market value.

When either of these criteria is met, the vote may qualify as significant following a manual assessment of the topic of the voting proposals.

Thus, a voting proposal at a general meeting is considered significant if it meets the capital share criteria and meets any of the following criteria:

- The proposal concerns environmental or social issues
- The vote is cast against management on matters related to mergers and acquisitions
- The vote is cast against management on matters related to remuneration
- The vote is cast against the recommendations of ISS

Additionally, a proposal may be deemed significant on a case-by-case basis if the subject matter is assessed to hold particular importance for other reasons, including economic reasons.

2024 – Companies Where Maj Invest's Ownership Share Exceeds 2%

Company	Owner share	Voted at meeting	Basis for significant vote	Topics and vote decisions on significant votes	For/against management	Results of significant voting proposals
MT Hoejgaard Holding A/S	4,7%	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Greenland Resources Inc	2,6%	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable

2024 – Stocks Representing Over 5% of the Market Value in Any Maj Invest Portfolio

Company	Port. Weight	Voted at meeting	Basis for significant votes	Topics and vote decisions on significant votes	For/against management	Results of significant voting proposals
DSV A/S	10,34	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Taiwan Semiconductor Manufac. Co. Ltd.	10,1	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Novo Nordisk A/S	8,89	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Pandora A/S	8,84	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Melrose Industries PLC	8,62	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Danske Bank A/S	7,98	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Mastercard Inc	7,75	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Schibsted ASA	7,09	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Alphabet Inc	6,52	Yes	11 shareholder proposals related to environmental and social	Items 4, 5, and 6 topics: Reports on the risks of omitting viewpoint and ideological diversity from the EEO policy and of electromagnetic radiation	Item 4: For Item 5: For Item 6: For Item 7: Against Item 8: Against Item 9: Against	All significant voting proposals were rejected. Support levels

			issues	<p>and wireless technologies, along with a proposal to adopt a policy requiring board members to disclose their political and charitable donations.</p> <p>Vote decision: A vote AGAINST these proposals is warranted, as the company's existing policies, commitments, and disclosures provide sufficient information, oversight, and compliance with relevant regulations to address the associated risks, including public health concerns, legal adherence, and EEO policy risks.</p> <p>Items 7, 8, 9, 10, 11, 12, 13, and 14 topics: Reports and proposals addressing climate risk in retirement plans, lobbying practices, voting rights structure, reproductive health misinformation, AI-related risks and oversight, human rights in targeted ads, and child safety policies on YouTube.</p> <p>Vote decision: A vote FOR these proposals is warranted as they would improve transparency and oversight on climate-related investment options, lobbying</p>	<p>Item 10: Against</p> <p>Item 11: Against</p> <p>Item 12: Against</p> <p>Item 13: Against</p> <p>Item 14: Against</p>	<p>as follows:</p> <p>Item 4: 0.2%</p> <p>Item 5: 0.8%</p> <p>Item 6: 0.3%</p> <p>Item 7: 3.7%</p> <p>Item 8: 15.2%</p> <p>Item 9: 31.3%</p> <p>Item 10: 6.4%</p> <p>Item 11: 7.4%</p> <p>Item 12: 17.6%</p> <p>Item 13: 18.5%</p> <p>Item 14: 14.1%</p>
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				activities, shareholder voting rights, reproductive health misinformation, AI risks, human rights impacts of targeted ads, and child safety measures—providing shareholders with better insight into how the company manages these important issues.		
Samsung Electronics	6,11	Yes	There were no significant proposals at this AGM.	There were no significant proposals at this AGM.	Not applicable	Not applicable
Demant A/S	5,95	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Moody's Corp	5,94	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Lowe's Cos Inc	5,86	No	Not applicable	No votes were cast at this meeting.	Not applicable	Not applicable
American Express Co	5,86	Yes	<p>1 management proposal related to remuneration</p> <p>2 shareholder proposals related to environmental and social issues</p>	<p>Item 3 topic: Advisory Vote to Ratify Named Executive Officers' Compensation.</p> <p>Vote decision: A vote against management and the proposal is warranted due to excessive personal use of corporate aircraft by the CEO.</p> <p>Item 6 topic: Proposals requesting reports on the company's climate lobbying activities.</p> <p>Vote decision: A vote FOR is warranted to improve transparency on alignment between the</p>	<p>Item 3: Against</p> <p>Item 6: Against</p> <p>Item 7: For</p>	<p>Proposal 3 was accepted</p> <p>Proposal 6 and 7 were rejected</p> <p>Support levels for the proposals are as follows</p> <p>Item 3: 95.1%</p> <p>Item 6: 24.4%</p> <p>Item 7: 0.8%</p>

				<p>company's lobbying activities and its net zero commitments.</p> <p>Item 7 topic: Proposals requesting reports on the company's policies regarding merchant category codes.</p> <p>Vote decision: A vote AGAINST is warranted as the company is already addressing risks related to merchant category codes for gun and ammunition stores.</p>		
Koninklijke Ahold Delhaize NV	5,85	Yes	There were no significant proposals at this AGM.	There were no significant proposals at this AGM.	Not applicable	Not applicable
Tryg A/S	5,84	No	Not applicable	Company subject to a non-voting strategy	Not applicable	Not applicable
Berkshire Hathaway Inc	5,67	Yes	6 shareholder proposals related to environmental and social issues.	<p>Items 2, 3, 4, 5 topics: Proposals requesting reports on greenhouse gas emissions from underwriting and investments, disclosure of BHE's emissions and progress, assessment of diversity, equity, and inclusion efforts, and the establishment of a railroad safety committee.</p> <p>Vote decision: A vote FOR these proposals is warranted as they would enhance transparency on emissions and climate strategies, improve disclosure on diversity</p>	<p>Item 2: Against</p> <p>Item 3: Against</p> <p>Item 4: Against</p> <p>Item 5: Against</p> <p>Item 6: For</p> <p>Item 7: For</p>	<p>All significant voting proposals were rejected.</p> <p>Support levels as follows:</p> <p>Item 2: 21%</p> <p>Item 3: 17.7%</p> <p>Item 4: 20.5%</p> <p>Item 5: 3.6%</p> <p>Item 6: 0.8%</p> <p>Item 7: 1.4%</p>

				<p>efforts, and establish a dedicated railroad safety committee to strengthen safety measures, promote ethical practices, and support long-term value and stakeholder protection.</p> <p>Item 6 and 7 topics: Proposals requesting reports on the impact of energy policy research on the company's financial statements and on risks associated with the company's operations in China.</p> <p>Vote decision: A vote AGAINST is warranted as the company's existing disclosures on climate policy and operations in China are sufficient, and the requested reports would not provide meaningful additional insight.</p>		
SoftBank Group Corp	5,52	Yes	There were no significant proposals at this AGM.	There were no significant proposals at this AGM.		Not applicable
NKT A/S	5,37	No	Not applicable	Company subject to a non-voting strategy		Not applicable
China Construction Bank Corp	5,36	No	Not applicable	Company subject to a non-voting strategy		Not applicable
Novonesis A/S	5,16	No	Not applicable	Company subject to a non-voting strategy		Not applicable
AutoZone Inc	5,12	Yes	There were no significant proposals at	There were no significant proposals at this AGM.		Not applicable

			this AGM.			
Qualcomm Inc.	5,08	No	Not applicable	Company subject to a non-voting strategy		Not applicable

Client access to voting information

Maj Invest is committed to transparency and has published. Proxy voting statistics will be included in the Maj Invest Asset Management ESG Report, scheduled for publication in Q2 2025.

Furthermore, Maj Invest offers clients the opportunity to request additional information regarding voting activities conducted on their behalf. Clients wishing to obtain such information may contact Maj Invest at legalcompliance@majinvest.com or reach out to their designated client manager.