

## Sustainability related disclosures

BI Asset Management Fondsmæglerselskab A/S ("BIAM") is an investment manager and part of the BankInvest Group.

As an investment firm which provides portfolio management, BIAM is subject to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the SFDR).

### Policy on integration of sustainability risks

In accordance with Article 3 of the SFDR, BIAM has a policy on the integration of sustainability risks. The *Policy for corporate social responsibility and responsible investment* is available in English here: [https://bankinvest.dk/media/wzmoumm3/policy-for-responsible-investments-and-sustainability-risks-december-2021\\_en.pdf](https://bankinvest.dk/media/wzmoumm3/policy-for-responsible-investments-and-sustainability-risks-december-2021_en.pdf)

### Statement on principal adverse impacts

BIAM voluntarily chooses to publish a statement on due diligence policies in accordance with Article 4 of the SFDR.

BIAM has a *Policy for corporate social responsibility and responsible investment*, in which the process for identifying and prioritizing the principal adverse sustainability impacts and indicators is handled.

The principal adverse sustainability impacts are described below in the form of compliance with international principles in the field of environment, labor and human rights as well as anti-corruption. If an issuer violates one or more of these principles, BIAM will seek to influence the company to change its behavior. This is described in the policy.

In addition, BIAM has a *Policy for active ownership and exercise of voting rights*, as active ownership is one of the cornerstones on which BIAM's investment policy is based. The policy must ensure that BIAM promotes long-term value creation and ensures compliance with the guidelines in the Shareholder Rights Directive ("SRD II"). The policy thus forms the framework for BIAM's work with active ownership, including the exercise of voting rights, and covers BIAM's corporate investments in general. Important areas include, but are not limited to: transparency, management remuneration, good corporate practice, and CSR policies.

The general work with active ownership is rooted in and monitored by the internal Responsible Investment Committee.

BIAM's investments undergo at least once a year a norm-based screening for violations of the following international norms and conventions within, among other things, human rights, labor rights and the environment:

- The UN Global Compact  
Ten principles on the environment, anti-corruption, employee rights and child labour, human rights etc.
- The UN Declaration of Human Rights  
Including a prohibition against forced labour and discrimination, the right to a fair trial, the right to freedom of speech etc.

- The OECD guidelines for multinational enterprises  
Including how enterprises minimise the negative impact of their activities and how business can contribute to financial, social and environmental progress.
- The ILO labour market conventions on dignified conditions for the labour force  
Including the conventions on abolition of child labour, discrimination, forced labour and the right to organise and collective bargaining.

In addition, business investments are assessed on various parameters such as the plan for CO<sub>2</sub> reduction, management of employee relations and product safety, and whether they have policies in place within corporate governance.

#### Remuneration policy

The remuneration policy for the BankInvest Group - which BIAM is a part of - is updated to include information on how the policy is consistent with the integration of sustainability risks in accordance with Article 5 of the SFDR.

The policy is published on BankInvest's Danish website and is available here: [lønpolitik-2021-12.pdf \(bankinvest.dk\)](#)