

ESG – market, regulation and NAM's position Presentation to NFF

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January 2022



Nordea Asset Management: Early investment in ESG products and tools

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ESG risk is today recognised as fact – and can be Physical, Legal, Reputational, Transitionrelated, tied to Degradation of Natural Capital, or...

Adani mine contractor says no insurer will cover its work on project, as providers flee due to risk

'Our paychecks bounced': US workers

in limbo as coalmines suddenly close

By national science, technology and environment reporter Posted Thu 13 May 2021 at 8:54pm, updated Fri 14 May 2021 i



AUTOS

MARCH 17, 2020 / 11-24 AM / UPDATED 2 YEARS AGO



The sovereign transition

to sustainability

Understanding the dependence of sovereign debt on nature

The consensus on the relevance of ESG to returns has changed





Nordea is a leading European ESG manager



MANAGER RANK	(INGS:

SOCIAL RESPONSIBILITY/SUSTAINABILITY

Rar	ık	Group name	Change
	1	Robeco	-
	2	NYL IM /CANDRIAM	-
	3	Pictet AM	-
	4	Nordea	-
	5	BlackRock	+12
	6	BNP Paribas	1
	7	Amundi	-2
	8	Natixis IM	2
	9	-	
1	10 Vontobel AM		

Firm	Net Flows (USD Million)
BlackRock	11,323
Amundi	9,083
Nordea	4,968
UBS	4,802
BNP Paribas	4,801
Eurizon	3,853
Nikko AM	3,633
Royal London	3,163
Union Investment	2,854
Credit Suisse	2,509



Source: Morningstar Direct, Morningstar Research. Data as of June 2021.

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The EU Commission is serious about this, too!

SFDR

- Meant primarily to govern disclosure requirements, when making claims about ESG and sustainability about investment products
- (Over)interpreted by the market as a proxy for ESG/Sustainability labels
- Does require some tests to be performed:
 - "Good Governance" (Art 8 and 9)
 - DNSH (Art 9)

MiFID II Sustainability Update (Aug 2022)

- Introduces requirement to perform customer due diligence regarding sustainability preferences – Nordea Bank far ahead!
- Governs what can be sold to clients with Sustainability Prefererence. Must have at least one of below:
 - a) Minimum proportion sust. investments, or
 - b) Minimum Taxonomy aligned investments, or
 - c) Takes into account (and reports on) PAI
 - Introduces requirement to perform **product governance** ref. sustainability – applies to both producer and distributor!

MiFID will be the "binding constraint"!

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EU Taxonomy

- Defines what is a sustainable economic activity
- Starting with environment/climate social taxonomy next
- Is a tool used by SFDR and MiFID, but also governs companies' own disclosure under CSRD – incl. Nordea Bank!

Key terms to keep in mind:

- SFDR Article 6, 8 and 9 the first thing most will look at, but not the last
- "Double Materiality" the commission wants you to take externalities into account, even if not immediately financially material
- Taxonomy eligible vs taxonomy aligned few activities are eligible, and even fewer aligned
- Activity level (taxonomy) vs issuer level (SFDR)
- Estimated vs reported data current data coverage and quality is low
- "Principal Adverse Impact" 18+ key indicators of "ESG-ness"
- "Good Governance" going beyond the traditional definition to include employee relations and tax issues
- "Do no Significant Harm" Can probably be context-dependent but still to be taken seriously
- "Sustainable Investments" Must have GG, DNSH and contribute to a sustainability goal (e.g. Taxonomy, SDG's)
- **CSRD** will change the data landscape (see estimated vs reported)

Article 8

 Promotes environmental or social characteristics, or a combination



• Must have **good governance practices** (sound management structures, employee relations, staff remuneration, tax compliance)



Article 9

- Must have a sustainable investment objective
 - Economic activities that contribute to an environmental objective
 - Key resource efficiency indicators (use of energy, renewable energy, raw materials, water and land, production of waste, GHG emissions, impact on biodiversity and circular economy)
 - (or) Economic activities that contribute to a social objective
 - Tackle inequality or foster social cohesion
 - Social integration and labor relations
 - Investment in human capital or economically or socially disadvantaged communities
 - DNSH principle (OECD, UNGPBHR, ILO, IBHR) AND principal adverse impact indicators (14+) to be taken into account
 - Follow good governance practices, in particular with respect to sound management structures, employee relations, staff remuneration, tax compliance

Nordea Asset Management's RI AUM in detail Q3, 2021



Source: Nordea Investment Management AB. Data as of: 30.09.2021



SFDR Classification: Article 8 is a "broad church"





Each Asset Manager must decide what they are willing to present as Art 8

Nearly verbatim extract of NAM's classification policy

Article 8 Classification Approach	Example	Level of Sophistication Spectrum
Exclusion	Exclusionary criteria include: Controversies (products and conducts) and exposure to Non-renewable energy.	Less
ESG rating	Achieve an ESG score of its portfolio greater than that of the Benchmark, and aims to invest in all or a certain level of ESG Rated securities (e.g. 90% in some funds checked)	
Exclusion + ESG Scoring	 Exclude issuers exposed to thermal coal and UN Global Compact violators Tilt towards issuers ranked higher on selected ESG criteria and green bond issues Underweight/exclude lower ranking issuers 	
Exclusion + Investment Threshold	 Apply principle-based exclusions Set a minimum threshold (50% or 70%) to invest in companies that promotes characteristics included in the proprietary sustainability framework (which focus on climate change mitigation and adaptation, water and waste management, biodiversity, product safety, supply chain, health and safety and human rights) 	
Enhanced exclusion + ESG Scoring + Scenario-aligned Policy + Thematic Strategy + Active Ownership & Engagement	Classified funds meet four or above of below criteria: - Norms-based Screening & Exclusion: involvement in coal mining, nuclear weapons, cluster munitions, anti-personnel mines, oil sand, violation of human rights, depleted uranium ammunition - Principal Adverse Impact integration: currently evaluates GHG emissions, Biodiversity, Water, Waste, Social and Employee matters and Human rights - Active Ownership & Engagement - Paris Aligned Fossil Fuel Policy: sets thresholds for companies' exposure to fossil fuel production, distribution and services; excludes those exceed the thresholds if they do not have a documented transition strategy that aligns with the Paris agreement - Proprietary ESG scoring: select those scoring high on proprietary ESG scoring system, taking SDG alignment into consideration and analysing risks using SASB materiality map - Thematic ESG strategies - Enhanced exclusion filters and other limits: assess a company's involvement in a specific activity measured by the revenue derived from this activity	More

Source: Company data, Goldman Sachs Global Investment Research

Nordea's classification is conservative





Where is the tipping point?





Even Art 6 does not mean that ESG can be ignored





SFDR language

Addressing the "Double Materiality" i.e. not just portfolio risk, but externalities too!

Environmental and social materiality (~ PAI's)

"Sustainable development is development that meets the needs of the present, without compromising the ability of future generations to meet their own needs."

"Our common future" (The Brundtland report), October 1987

Financial materiality (~ Sustainability risk)



Product Governance and CDD under MiFID – the European perspective



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Appendix – for discussion if relevant



Nordea Asset Management Responsible Investments Team





Eric Pedersen Head of Responsible Investments				
Eric Pedersen ESG Quant	Climate	Michaela Zhirova ESG Products & Research	Katarina Hammar Active Ownership	Hetal Damani Impact Private Equity
Julien Grouillet Senior ESG Analyst Thrainn Halldorsson ESG Data Scientist Louis Beuzit ESG data Scientist	Harry Granqvist Senior ESG Analyst Astrid Fellingham Senior ESG Analyst Sara Romby Student ESG Analyst	Katarzyna Salacinska Senior ESG AnalystQuentin Hutteau ESG AnalystPhilip Wrangberg Senior ESG AnalystTill Jorde ESG Analystn.n. Senior ESG AnalystESG Analyst	Arvinder TiwanaElin NoringSenior ESG AnalystESG AnalystMagdalena Kettis, PhDMats HellströmDirector,Senior ProxyThematic EngagementVoting Analyst(Proxy Voting Team: Erik Durhan, Jan Särlvik)	Olena Velychkon.nSenior Impact AnalystSenior Impact Analystn.n.Fuad AlamSenior Impact AnalystStudent ESG AnalystTim BuckbyDirector, Impact Private Equity
 ESG Risk score models Proprietary ESG platform, tools and development Ad hoc ESG Data-driven analysis 	 Focused climate and related expertise NZAM TCFD, IIGCC etc. Labels 	 Stars product responsible Company analysis and scoring Product development Investment-led engagement 	 RI policy/RIC and norm/incident based engagement Thematic engagement, industry initiatives and proxy voting Overall engagement planning, coordination and reporting 	 Trill Impact product responsible ESG and SDG impact analysis Impact roadmap activities with portfolio companies
Source: Nordea Investment Ma			<section-header><section-header><section-header><section-header></section-header></section-header></section-header></section-header>	

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Paris alignment in practice: The Nordea Fossil Fuel Transition List selects fossil fuel companies that align with the 2°C target



18 Sources: Nordea Asset Management, Transition Pathway Initiative







NAM Responsible Investments Team



RI Team provides Thematic and Norms/PAI-driven engagement across portfolios

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RI Team maintains Paris-Aligned Fossil Fuel (PAFF) positive list of companies used by most Art 8/9 products

Integrating PAI: Moving firm-level screening from re-active to pro-active

PAI integrated into the existing norms screening process (all products)



Additional layer of analysis for Article 8/MiFID "ESG" products ("to be")

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Proprietary ESG Scoring The process



The ESG scorecard

Nordea Asset Management's approach to "Best in Class" ESG standards

Pillar	Business Model	Governance Quality	Business & Governance Ethic	Environment	Social	 Rating Key sector issues are identified (SASB) These are complemented with key company-specific issues Each pillar is rated – one overriding factor can not arbitrarily set the rating Policy, strategy, performance are KPIs evaluated
Rating	A, B, C	A, B, C	A, B, C	A, B, C	A, B, C	Weighting
ESG Risks			Risk Exposure 1-3 Financial Risk 1-3 Reputational Risk 1-3	Risk Exposure 1-3 Financial Risk 1-3 Reputational Risk 1-3	Risk Exposure 1-3 Financial Risk 1-3 Reputational Risk 1-3	 Business model 30% Governance Quality 10% (implicitly assessed in the remaining three pillars) Business ethics, Environment and Social have variable weights based on 1. Risk exposure: Materiality Key risk if more than 30% of operations in high risk area Einancial Impact: Magnitude example finance
Weight	30%	10%	Variable (%)	Variable (%)	Variable (%)	 2. Financial Impact: Magnitude example fines 10% of revenue 3. Reputational: Impact on brand/reputation

Source: Nordea Investment Management AB. Note: For illustrative purposes only.

The quality our ESG expertise was recognised in the run-up to SFDR Firmly positioned amongst the top ESG players



ESG rated funds in 4 and 5 star categories as a % of total ESG rated funds, and the % of ESG funds with a Morningstar Sustainability rating above average/high²



Source: Morgan Stanley Research as of May 2020. Note: The chart herein contain, is a fragment of Morgan Stanley Research "Who is Best Placed if Covid-19 Accelerates ESG Trends?" and includes the top 25 Managers by size of ESG AuM as per Morningstar data. © 2020 Morningstar, Inc. All Rights Reserved as of 30.04.2020, US Flex Cap Equity. The Morningstar Rating is an assessment of a fund's past performance — based on both return and risk — which shows how similar investments compare with their competitors. A high rating alone is insufficient basis for an investment decision. **Past performance is no guarantee of future results.** Historical Sustainability Score as of 31.03.2020. Sustainability Rating as of 31.03.2020. Sustainability score. Nordea Investment Funds S.A. only publishes product-related information and does not make any investment recommendations.

NAM is a founding member of NZAM – 1st targets published November 1st: 57% of Equity AuM

NET ZERO ASSET MANAGERS INITIATIVE

The Net Zero Asset Managers initiative is an international group of asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5 degrees Celsius; and to supporting investing aligned with net zero emissions by 2050 or sooner.

128 signatories \$43 trillion in assets under management





How do NZAM targets relate to PAI and PAFF? They all pull in the same direction



25 1) Not accounting for the decarbonization that will be delivered by PAFF companies who have set emission targets, which is a central component of PAFF.



NAM engagement processes



Co-ordination and
prioritisation by RI
Active OwnershipTracking and
reporting by RI ActiveProxy voting by
Corporate Governance/
Active Ownership



Concrete company dialogue managed co-operatively between RI and boutiques





Active Ownership: Key tool to create impact and performance – and to manage reputational risk



Engagements in 2020

Source: UN, https://www.un.org/development/desa/en/news/sustainable/sustainable-development-goals.html

Engaged Sectors



Engagement - SDGs



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We have ramped up our voting – as required by clients

- In January 2021 we introduced the Voting 2.0 project, with a goal to heavily increase voting over the next two years.
 - Goal for 2021 was 80% of all votes for the year 2021 while the corporate governance team implemented the new setup.
- For the period start of January until June we have voted in **around 95%** of all AGM/EGMS
- Above our stated goal of 80% for 2021, with a majority of the season now behind us.





Climate Engagement: Nordea's TCFD climate disclosure engagement campaign 2019-2021



What?

The Nordea RI team selected 33 companies to engage on the TCFD recommendations



TCFD recommends climate-related disclosures on

Improve climate-related disclosure

- Governance
- Strategy

Why?

- Risk management
- Metrics & targets

Who?

Top NAM holdings and STARS funds

Companies selected from this universe based on

- Not part of Climate Action 100+
- High total GHG emissions
- High GHG intensity
- Not already committed to TCFD

When?

Public commitments by 2020-2021

- Letters to company CEOs were sent in July 2019, spelling out NAM's expectations that...
- full TCFD alignment may take years, but that
- our objective was for companies to publicly declare their alignment ambitions in 2020-21

Climate engagement - Nordea leads the coalition to cancel Vung Ang 2



Engaging with the pharma industry on water pollution



ADVISORY PANEL

In 2018 we formed our Advisory Panel to challenge our thinking, help us consider strategic questions and anticipate future developments. In 2019 we added several new members to the Panel, ensuring a broad view across the sector's responsibility issues and specialist expertise on important topics.



HILLARY AMSTER HEAD OF THEMATIC ENGAGEMENT RESPONSIBLE BUSINESS ALLIANCE "PSCI and the RBA have a similar mission of positively affecting the environment and the lives of workers throughout the supply chain. By sharing best practices, both organizations can broaden and deepen the impact for these important causes.

MAGDALENA KETTIS

SARAH STEINGRÜBER

AND GLOBAL HEALTH LEAD

PHARMACEUTICAL SUPPLY CHAIN INITIATIVE (PSCI)

CURBINGCORRUPTION.COM

INDEPENDENT GLOBAL HEALTH CONSULTANT

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HEAD OF THEMATIC ENGAGEMENT

"Nordea has engaged with the pharma industry and PSCI on

pharmaceutical pollution since 2015 and I look forward to strengthening

our dialogue on this and other important and challenging issues through

the PSCI Advisory Panel. Stepping up responsibility in pharma production is

imperative. Pollution from antibiotic production is particularly problematic as it fuels the spread of AMR - a global health and wealth threat."

Corruption in the pharmaceutical supply chain not only jeopardizes

ndustry performance but endangers people's lives. I'm pleased to support the PSCI to tackle the issue of corruption, address the risks in supply chain

nd identify preventative measures for the betterment of human health



the whole sector "

challenge the PSCI to think bigger,

RACHEL COOPER DIRECTOR HEALTH INITIATIVE TRANSPARENCY INTERNATIONAL "Transparency International Health Initiative seeks to be a 'critical friend' to the pharmaceutical sector. We are elighted to sit on the PSCI Advisory Panel and were particularly pleased to see that PSCI's robust membership policy commits to maintaining and encouraging high standards rather aim higher, and become the voice for than a race to the bottom."

GERALD PACHOUD

MANAGING PARTNER PLUTO & ASSOCIATES

"Collective action is certainly one of the best ways to address complex systemic issues. Through their own actions, the PSCI members can implement higher standards of social responsibility. Through collection action, they can everage their experience, sharing and cooperation to move their entire sector beyond compliance. The PSCI brings together most, if not all, major players in the pharmaceutical industry. It therefore has tremendous leverage over responsibility practices and could really change the field."



HEAD OF CORPORATE SOCIAL RESPONSIBILITY "Takeda is proud to be part of the PSCI and to have held the Chair in 2017. The Advisory Panel was a change for me to encourage my colleagues to think big, and to look for external partnerships in support of their

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Nordea's Expectations on the Pharma Industry:

• The pharma industry adopts a common approach that

- builds on the belief that large global companies can have real influence if they cooperate with each other and work with their partners to achieve better industry-wide standards
- recognizes the need to build the capacity of partners in the supply chain
- involves engaging with local regulators, authorities and NGOs
- Leading pharma companies commit to contribute to the protection of water resources in India.
- o A pharma industry position and action plan addressing pharma water pollution in India with emissions reduction targets for suppliers at relevant production sites.



ANNUAL REPORT 2019

Anti Money Laundering (AML) initiative with banks 2020-2021

What?

The RI team is engaging with 11 European banks to improve AML risk transparency

ING Faces Fresh Money Laundering Allegations in Italy

The Bank of Italy ordered the Dutch firm to stop taking on new clients over the weekend

 David Kindenley, Regulation (Institutional EX.) (Monday: 18/03/2016) 15:18 GMT+2



Nordea 'underestimated systems needed' for AML, says CEO

BY DOMINIC O'NEIL April 02, 2019



Casper von Koskull calls for a supranational anti-money laundering (AML) authority in Europe, while pushing the ECB to relax its dividend leash to boost strong banks.

Casper von Koskull, chief executive of Nordea, has admitted the risks of criminals using its network caught Scandinavia's biggest bank off guard, as an AML scandal sweeps across the Nordic region.

Swedbank admits to n	noney-laundering failings

Sweden's oldest bank offers clearest comments yet on lapses in \$135bn dirty money scandal

Richard Milne, Nordic and Baltic Correspondent SEPTEMBER 17 2019

Danske Bank cuts outlook as money laundering scandal weighs

Jacob Gronholt Pedaries

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COPENHAGEN (Reuters) - Danske Bank lowered its outlook for 2019 after a disappointing first quarter, due in part to the effects of a massive money laundering scandal at its Estonian branch that has sent ripples across the Nordic banking sector.



Why?

Improve AML-related disclosure

- Fighting money laundering has become a high-prole issue for the Nordic region after Danske Bank and Swedbank became embroiled in a money laundering scandal involving their businesses in the Baltics, costing both billions in market value. The issue is not limited to the Nordic region as shown by Deutsche Bank and ING cases.

- As this is an industry wide issue and there is limited transparency provided on the key risk indicators, NAM have decided to initiate a collaborative engagement in a small group of asset owners.

Who? Big European banks and STARS funds

- European (5) and Nordic banks (6)
- Relevant for Stars investments

When?

Initiated in 2020 with first results in 2021

The desired outcome of this work is increased transparency on key AML compliance management activities.

Corporate Human Rights Policy Engagement



The Corporate Human Rights Benchmark is a unique collaboration led by investors & civil society organisations dedicated to creating and publishing a public benchmark on corporate human rights performance





Figure 1: Average Score by Measurement Theme (darker colour blocks indicate proportion achieved)

