



LEA 02	Disclosures: Mandatory	Reason for Interaction	Principle: PRI 1, 2, 3
Individual/ internal staff engagements	<p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage investor ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in internal staff</p>		
Collaborative engagements	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage investor ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in collaborative engagements</p>		
Service provider engagements	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage investor ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in service provider engagements</p>		

RI TRANSPARENCY REPORT

2017

Storebrand Asset Management

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2017 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	RI activities for listed equities	✓	Public							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	n/a							✓
OO End	Module confirmation page	✓	-							

Strategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public							✓
SG 03	Conflicts of interest	✓	Public							✓
SG 04		✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 08	RI in performance management, reward and/or personal development	-	n/a							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13	Long term investment risks and opportunity	✓	Private	✓						
SG 14	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 15	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 16	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 17	Innovative features of approach to RI	✓	Private							✓
SG End	Module confirmation page	✓	-							

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public							✓
LEI 02	Reporting on strategies that are <10% of actively managed listed equities	🔒	n/a							✓
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Private	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Private	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Private	✓						
LEI 09	Types of sustainability thematic funds/mandates	✓	Public	✓						
LEI 10	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 11	Processes to ensure integration is based on robust analysis	✓	Private	✓						
LEI 12	Aspects of analysis ESG information is integrated into	✓	Private	✓						
LEI 13	ESG issues in index construction	✓	Public	✓						
LEI 14	How ESG incorporation has influenced portfolio composition	✓	Private	✓						
LEI 15	Measurement of financial and ESG outcomes of ESG incorporation	✓	Private	✓						
LEI 16	Examples of ESG issues that affected your investment view / performance	✓	Private	✓						
LEI 17	Disclosure of approach to ESG incorporation	✓	Public		✓					✓
LEI End	Module confirmation page	✓	-							

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓					
LEA 06	Objectives for engagement activities	✓	Public		✓					
LEA 07	Role in engagement process	🔒	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	🔒	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	✓	Private	✓	✓					
LEA 10	Tracking number of engagements	✓	Public		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Private		✓					
LEA 12	Engagement methods	✓	Private		✓					
LEA 13	Engagements on E, S and/or G issues	✓	Private		✓					
LEA 14	Companies changing practices / behaviour following engagement	✓	Private		✓					
LEA 15	Examples of ESG engagements	✓	Private		✓					
LEA 16	Disclosure of approach to ESG engagements	✓	Public		✓				✓	
LEA 17	Voting policy & approach	✓	Public	✓	✓	✓				
LEA 18	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 19	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 20	Confirmation of votes	✓	Private		✓					
LEA 21	Securities lending programme	✓	Private		✓					
LEA 22	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 23	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 24	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 25	Shareholder resolutions	✓	Private		✓					
LEA 26	Examples of (proxy) voting activities	✓	Private		✓					
LEA 27	Disclosing voting activities	✓	Public		✓				✓	
LEA End	Module confirmation page	✓	-							

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive,active strategies	✓	Private							✓
FI 02	Option to report on <10% assets	🔒	n/a							✓
FI 03	Breakdown by market and credit quality	✓	Private							✓
FI 04	Incorporation strategies applied	✓	Public	✓						
FI 05	ESG issues and issuer research	✓	Private	✓						
FI 06	Processes to ensure analysis is robust	✓	Public	✓						
FI 07	Types of screening applied	✓	Public	✓						
FI 08	Negative screening - overview and rationale	✓	Public	✓						
FI 09	Examples of ESG factors in screening process	-	n/a	✓						
FI 10	Screening - ensuring criteria are met	✓	Public	✓						
FI 11	Thematic investing - overview	✓	Private	✓						
FI 12	Thematic investing - themed bond processes	✓	Public	✓						
FI 13	Thematic investing - assessing impact	✓	Public	✓						
FI 14	Integration overview	✓	Public	✓						
FI 15	Integration - ESG information in investment processes	✓	Public	✓						
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 17	ESG incorporation in passive funds	🔒	n/a	✓						
FI 18	Engagement overview and coverage	✓	Private		✓					
FI 19	Engagement method	✓	Private	✓	✓					
FI 20	Engagement policy disclosure	✓	Private	✓	✓					
FI 21	Financial/ESG performance	✓	Private							✓
FI 22	Examples - ESG incorporation or engagement	-	n/a	✓	✓					
FI 23	Communications	✓	Public		✓				✓	
FI End	Module confirmation page	✓	-							

Storebrand Asset Management

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the type that best describes your organisation or the services you provide.

- Non-corporate pension or superannuation or retirement or provident fund or plan
- Corporate pension or superannuation or retirement or provident fund or plan
- Insurance company
- Foundation
- Endowment
- Development finance institution
- Reserve - sovereign or government controlled fund
- Family office
- Other, specify

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

Norway

OO 02.2

Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

OO 02.3

Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

1745

OO 03

Mandatory

Public

Descriptive

General

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

OO 04

Mandatory

Public

Gateway/Peering

General

OO 04.1 Indicate the year end date for your reporting year.

31/12/2016

OO 04.2 Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.

	trillions	billions	millions	thousands	hundreds
Total AUM		575	000	000	000
Currency	NOK				
Assets in USD		68	495	644	125

OO 06

Mandatory

Public

Descriptive

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

OO 06.1 How you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	0
Fixed income	>50%	0
Private equity	<10%	<10%
Property	<10%	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0

Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 09	Mandatory to Report Voluntary to Disclose	Public	Peering	General
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OO 09.1 Indicate the breakdown of your organisation's AUM by market.

Developed Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Emerging, Frontier and Other Markets	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %
<i>Total</i>	<i>100%</i>

Gateway asset class implementation indicators

OO 10	Mandatory	Public	Gateway	General
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OO 10.1 Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.

- We incorporate ESG in our investment decisions on our internally managed assets
- We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.

OO 10.2 Select the direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.

- We engage with companies on ESG factors via our staff, collaborations or service providers
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

OO 10.3 Select the direct or indirect voting activities your organisation implemented for listed equity in the reporting year

- We cast our (proxy) votes directly or via dedicated voting providers
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 11	Mandatory	Public	Gateway	General
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OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

- Fixed income – SSA
- Fixed income – corporate (financial)
- Private equity
- Property
- None of the above

OO 11.2 Select the externally managed assets classes where you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year)

- Private equity
- None of the above

Storebrand Asset Management

Reported Information

Public version

Strategy and Governance

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input checked="" type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3

Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Processes / approaches to incorporating ESG
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4	Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.
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- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

SG 01.5	Describe your organisation’s investment principles, and overall investment strategy, and how they consider ESG factors and real economy impact.
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Storebrand's Group Policy on sustainable investments is an overarching structure stating Storebrand's vision and goal on sustainable investments. Storebrand's work on sustainable investments is motivated by the following factors

- secure long term returns
- avoid complicity to breaches of international norms or conventions through our investments.
- contribute to positive impact on society and the environment

The Group Policy references the UN PRI framework and has included existing policies and guidelines on more specific issues as reference documents. Scope, responsibilities, follow up and reporting is also defined in this overarching policy. Storebrand's Group Policy on sustainable investments covers all asset classes and geographical regions, as well as all externally managed assets,

In addition Storebrand has policy documents relating to the definition and implementation of the Storebrand standard. The standard applies to all AUM and guides work on exclusions and on active ownership. The policy documents are broken into subject areas (eg. corruption, human rights and environmental degradation) and outline relevant international conventions, motivation and methodology.

Policy documents also exist on Storebrand's position on global sustainability trends and on the relationship between sustainability and financial returns.

No

SG 01.6	Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]
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In addition, a set of policies apply to the selection of external asset managers. Comprehensive ESG guidelines are outlined in the selection process with sustainability being one of the key selection criteria. In addition policies regarding follow up and monitoring of external fund managers ensure quarterly screening and engagement with managers.

SG 02	Mandatory	Public	Core Assessed	PRI 6
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1

Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

- Attachment (will be made public)

Attachment

[Storebrand Sustainable Investments Policy.pdf](#)

- Formalised guidelines on environmental factors

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/storebrand-standard>

- Attachment (will be made public)

Attachment

[2016_September_Storebrand_Analysis_Criterion - Environmental damage.pdf](#)

- Formalised guidelines on social factors

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/storebrand-standard>

- Attachment (will be made public)

Attachment

[Storebrand Analysis Criterion - Human Rights.pdf](#)

- Formalised guidelines on corporate governance factors

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/storebrand-standard>

- Attachment (will be made public)

Attachment

[2016 Storebrand Analysis Criterion - Corruption and financial crime.pdf](#)

- Screening / exclusions policy

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/storebrand-standard>

- Attachment (will be made public)

Attachment

[Storebrand - Sustainable Investments - Storebrand Standard.pdf](#)

- Engagement policy

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/guidelines/attachment/4823?ts=15457c4c9f3>

- Attachment (will be made public)
- (Proxy) voting policy

URL/Attachment

- URL

URL

<https://www.storebrand.no/site/stb.nsf/Pages/corporategovernance.html>

- Attachment (will be made public)
- We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

- Attachment
- Your investment objectives that take ESG factors/real economy influence into account

URL/Attachment

- URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

- Attachment
- Processes / approaches to incorporating ESG
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities

URL/Attachment

URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

Attachment

ESG incorporation approaches

URL/Attachment

URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

Attachment

Active ownership approaches

URL/Attachment

URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

Attachment

Reporting

URL/Attachment

URL

URL

<https://www.storebrand.no/en/sustainability/guidelines>

Attachment

We do not publicly disclose any investment policy components

SG 02.3

Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

URL

<https://www.storebrand.no/en/sustainability/guidelines>

No

SG 02.4

Additional information [Optional].

Please see the newly published integrated Annual Report for the Storebrand Group in English.

URL: <https://www.storebrand.no/investor-relations/arsrapporter>

SG 03

Mandatory

Public

Core Assessed

General

SG 03.1

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

No

SG 03.3

Additional information. [Optional]

No explicit policy, but acting on the principle that no parties will receive preferential treatment with respect to engagement, exclusion or voting.

In addition the internal Investment committee whose responsibility it is to make the final decision on excluded companies does this without knowledge of the company name. All documents prepared on exclusion cases are anonymous.

Objectives and strategies

SG 05

Mandatory

Public

Gateway/Core Assessed

General

SG 05.1

Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

Quarterly or more frequently

Biannually

Annually

Less frequently than annually

Ad-hoc basis

It is not reviewed

SG 05.2

Additional information. [Optional]

All group sustainability objectives are reviewed twice a year, including RI objectives.

In addition the sustainable investment team conducts a strategy seminar at the beginning of each calendar year to decide on focus areas and new innovation/developments for the coming year. The previous year is also reviewed in terms of ESG, financial and communication outcomes.

Governance and human resources

SG 07**Mandatory****Public****Core Assessed****General****SG 07.1**

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Head of Sustainability team**
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

SG 07.3 | Indicate the number of dedicated responsible investment staff your organisation has.

Number

10

SG 07.4 | Additional information. [Optional]

Dedicated RI staff include

- 7 ESG analysts in Front Office
- ??2 ESG analysts at subcontractor Cognizant ???
- 1 Environmental Manager (Real Estate)
- 2 dedicated Responsible Investment communication managers in Storebrand and SPP

Promoting responsible investment

SG 09

Mandatory

Public

Core Assessed

PRI 4,5

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 09.1 | Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Select all that apply

Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

- Participated in the UNPRI Working Group Indigenous Rights Collaborative Initiative.
- Signed Global investor letter to US SEC: carbon asset risks to oil and gas companies
- Signed Statement of Investor Expectations on Supply Chain Labour Practices in Agriculture

- AFIC – La Commission ESG
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

During 2016, Storebrand was involved in a letter to non-disclosing companies to ask them to disclose environmental data by signing the letter and sending the letter selv to companies regarding climate change. Some companies answered directly to Storebrand but dilogue continued with CDP.

- CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

During 2016, Storebrand was involved in a letter to non-disclosing companies to ask them to disclose environmental data by signing the letter and sending the letter to companies regarding forestry and water use.

- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- ESG Research Australia
- Eumedion
- EVCA – Responsible Investment Roundtable
- Extractive Industries Transparency Initiative (EITI)

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Contribution to conference content

- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
NORSIF Board member and participant in NORSIF Green Bonds working group
SWESIF Board member
Member of Norwegian Committee for Corporate Governance

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Part of the nominating committee in Swesif. Board member in Norsif. Actively contributing to events arranged by both organizations and in working groups.

- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Active members, particularly in the PSI initiative.

- United Nations Global Compact

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Participating in the Nordic network, reporting on Advanced level.

- Other collaborative organisation/initiative, specify
Sustainable Value Creation, Sweden

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

- Other collaborative organisation/initiative, specify

International Indigenous Working Group (IIWG): Gathers NGOs, investors, academia and private citizens to advocate for the rights of indigenous peoples..Organizer: Boston Common Asset Management

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Storebrand is part of the group since its establishment in 2016. The group meets monthly. Storebrand has contributed to the group by suggesting ways of advocating for indigenous peoples rights towards companies and authorities and giving updates and experiences regarding dialogue with companies regarding these issues. Main focus since October 2016 is on the DAPL

- Other collaborative organisation/initiative, specify
Signatory to the Montreal Pledge on climate disclosure

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

- Other collaborative organisation/initiative, specify
Member of the Portfolio Decarbonisation Coalition: Commitment to reduce carbon footprint of Portfolios.

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Participation in coalition meetings.

SG 10	Mandatory	Public	Core Assessed	PRI 4
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SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- Yes

SG 10.2

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Wrote articles on responsible investment in the media.
- Other, specify

No

SG 10.3

Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

Storebrand is a key participant in the Norwegian and Swedish public debate on responsible investments, for instance through opinion pieces in print/online media, broadcast media, social media.

Furthermore, we provide extensive training for clients, brokers, investment consultants and external fund managers, in addition to speaking at a range of conferences.

Storebrand also participates in international RI debates and events, as well as providing comments and interviews to international media.

External fund managers are subject to extensive RI requirements (policies, implementation, quarterly screening of portfolio ESG quality and controversial investments). External fund managers are also encouraged to adopt the UNPRI. Storebrand actively seeks funds from external managers with high ESG profile.

Sent letter to all external fund managers encouraging them to disclose the carbon footprint of their equities funds.

Updated in house White Paper on the link between responsible investment and financial returns, including review of studies/metastudies on this theme.

Published a number of articles/interviews on divestment from coal (companies with more than 30% of revenues from coal) and divestment from fossil fuels

Member of NORSIF board and active participant in arranging NORSIF events and membership seminars, Member of working group for Green Bonds.

Member of SWESIF board.

Implementation not in other modules

SG 12	Mandatory	Public	Descriptive	PRI 1
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
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- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG 12.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
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- We do the following
 - Allocation between asset classes
 - Determining fixed income duration
 - Allocation of assets between geographic markets
 - Sector weightings
 - Other, specify
- We do not consider ESG issues in strategic asset allocation

SG 12.3	Additional information. [OPTIONAL]
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The in house positioning for global ESG trends analysis, which is 40% of the overall sustainability rating, identifies three main ESG trends that are financially relevant for portfolio companies. Population Growth and Resource Scarcity, Growth in Emerging Markets and increased demand for Sustainable Products. Our analysis identifies trends that are relevant for specific sectors and companies that are well positioned for the effects of social, environmental and governance effects of these trends.

Regarding allocation, our fossil free funds avoid the Energy sector in its entirety and is significantly underweight in the Utilities sector.

SG 15	Mandatory	Public	Descriptive	General
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SG 15.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Private equity	See response in SG 16
Property	<p>With respect to investments in nonlisted real estate and property, Storebrand mainly invests in Norway and Sweden. Environmental aspects, in particular energy efficiency, are given special attention in the investment analyses. More than 50% of Storebrand's property base is internally managed and certified through the Norwegian environmental management scheme Eco-Lighthouse. The Environmental Manager, Real Estate, is responsible for ESG issues and reports to the Managing Director at Storebrand Real Estate. An environmental action plan has been developed, comprising energy management, environmental management systems for building operations and environmental strategy for new developments. Environmental classification through Breeam NOR is an important tool, which is used in renovations and new buildings as well as being introduced in operations (Breeam In-Use).</p> <p>In operations, data on energy and water use, waste production and recycling monitored on a weekly and monthly basis, and is reported quarterly (internal), and annually (external). Currently, the main focus is on the implementation of energy efficiency measures, transition from fossil energy to renewable energy, the use of life cycle assessments when replacing technical installations, quarterly reviews of the environmental accounts of suppliers, Environmental reporting and environmental strategy for the portfolio of external managers is to be further developed.</p>

SG 16	Mandatory	Public	Descriptive	General
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SG 16.1	Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Private equity	Investments are conducted through fund-of-funds structures, and as part of the due diligence process, external managers are rated on ESG implementation. A minimum score is required to qualify for investment. Evaluation includes formal adaption of ESG principles, managers' attitudes to ESG, as well as resources and practical implementation of ESG in their investment activities. If RI is not sufficiently covered by general investment criteria/fund terms, Storebrand requires a side letter recognizing the Storebrand Standard with objective excuse rights from participating in selected investments. ESG has also been adopted as a secular investment theme for the PE team, for example energy/waste/water.

Storebrand Asset Management

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

LEI 01	Mandatory to Report Voluntary to Disclose	Public	Gateway	General
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LEI 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Percentage of internally managed listed equities

74	Passive
9	Active - quantitative (quant)
17	Active - fundamental and active - other
100%	Total

ESG incorporation in actively managed listed equities

Implementation processes


LEI 03	Mandatory	Public	Gateway	PRI 1
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEI 03.1 Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)

ESG incorporation strategy (select all that apply)

- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)
- Screening and Integration strategies
- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined

Percentage of active listed equity to which the strategy is applied	 100
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- We do not apply incorporation strategies

Total actively managed listed equities

100%

LEI 03.2 Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

At Storebrand we believe that a multi-layered approach to sustainable investing is required in order to adequately address all risks and investment possibilities in the ESG area.

Screening: Is used as a basis for our strategy. Storebrand has one of the markets most stringent minimum standards and applies it to all assets under management, without exception. Screening of companies according to this standard allows us to capture operational ESG risks and to assure our clients that their assets not invested in companies that breach fundamental norms and conventions. The Sustainable Investment team is responsible for screening with input from an external data provider, and results are made available to fund managers in a quarterly report. Compliance is run daily. In 2016 Storebrand has extended the standard specifically in the area of coal exclusions.

In addition Storebrand has established an extra criterion on production of fossil fuels. This criterion excludes all companies with over 5% of revenue from the production or distribution of fossil fuels and applies to a range of fossil free funds offered in Sweden; SPP Plus Sweden, SPP Global Plus and SPP Emerging Markets Plus. The criterion is designed to meet increasing demand for fossil free investments from institutional clients.

Integration: The objective of integrating ESG into all investment activities is based on our belief that understanding ESG risks and opportunities will be a prerequisite for securing long term returns. Storebrand own literature reviews in 2016 have revealed that there is mounting evidence in international studies that the link between ESG performance and financial returns is strengthening. Our own internal analysis have also identified long term ESG trends that we believe will influence companies financial performance over the long term. Thus we see ESG integration in mainstream management of equities as necessary to capture the risks and market possibilities that apply to individual sectors/industries/companies. It is also a matter of strategic positioning to the Storebrand Group, and is utilised as a differentiating factor. Fund Managers are responsible for incorporating ESG factors into management with input from the Sustainable Investment team.

The launch of the SPP fossil free Plus funds from March-September 2016 marked a significant milestone in integration at Storebrand. Product development was fund manager driven and integrated ESG elements (carbon footprint/fossil screening and sustainability rating) into existing quantitative management models. The result is a family of funds that are low risk (<1 in tracking error) but that still manage to be fossil free, have a high sustainability rating and a low carbon footprint compared to the reference index.

Thematic: Storebrand does ESG analysis on specific themes and incorporates results into investment decisions. Themes are identified on a sector basis in annual sector analyses conducted by the Sustainable Investment team. Access to Medicine in Health Care, Renewable Energy Mix in Utilities and share of green buildings in real Estate are all examples of themes that directly affect investment decisions in these sectors.

In the light of the Paris Agreement on Climate Change Storebrand has had a focus throughout 2016 on climate risk and adjustment. Storebrand has strengthened its exclusion criteria on coal, developed fossil free criteria

and launched fossil free funds, engaged with palm oil companies, explored the possibility of setting Science Based Targets for our portfolio and begun a research project financed by Vinnova in Sweden that seeks to quantify the effects of coal exclusions. The recommendations of the taskforce on Climate Related Financial Disclosures will be followed up in 2017.

LEI 03.3

Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

The exclusion strategy comprises all assets managed in-house, and thus reduces the investment universe for all portfolio managers. On average 6-7% of the reference index is excluded.

The main tool of integration is the Sustainability Rating 0-100 which is made available to fund managers in their internal systems. The rating is utilised in various ways by different teams. Active managers have lower limits for sustainability scores for individual companies. Holdings in companies with scores below this limit (for example 25% in Developed markets funds) triggers a discussion with the Sustainable Investment team and a collaborative decision on further investment in the company. Passive managers of selected index funds/portfolios have begun to utilise methodology to optimise the sustainability rating of index near funds up to + 10%.

The global equity fund Storebrand Trippel Smart/SPP Global Topp100 is Storebrand's flagship Sustainability fund and selects companies based on the Sustainability Rating; i.e. investing only in top performers of each sector, combining thematic and screening methodology.

The family of Plus funds described above combine the following strategies

- screening based on Storebrand standard, fossil free criteria, and additional criteria
- optimisation based on carbon footprint and sustainability rating
- selection of "climate solution portfolio"

(A) Implementation: Screening

LEI 06

Mandatory

Public

Descriptive

PRI 1

LEI 06.1

Indicate and describe the type of screening you apply to your internally managed active listed equities.

Type of screening

- Negative/exclusionary screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

The Storebrand Standard applies to **all internally managed funds and portfolios**, and covers: 1) Product related exclusions: controversial weapons (landmines, cluster munitions, nuclear weapons, chemical/biological weapons) and tobacco 2) Controversial issues: human rights and international humanitarian law, corruption and economic crime, environmental degradation 3) Sector specific exclusions: lowest performing companies in high risk industries + climate related (companies with more than 30% of revenues from coal, oilsand companies, palm oil companies involved in extensive deforestation)

Extra ethical criteria in addition to the Storebrand standard applies to some dedicated Sustainability funds. The extended Storebrand standard is has additional screening criteria such as revenues from alcohol, pornography, gambling and defence contracts. There is also extra fossil free criteria that excludes all companies with over 5% of revenues from the production and/or distribution of fossil fuels. Companies with over 100 million tonnes CO2 embedded in reserves are also excluded on this criteria.

Positive/best-in-class screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

Our in-house ESG team analyses the constituents of MSCI All Country World Index + largest companies listed on the Oslo and Stockholm Exchanges with respect to ESG performance. The Sustainability Rating is 0-100, sector based and comprises:

- A) ESG management systems (policies, practice and performance) (40% of score)
- B) Positioning for shifting business frameworks and global sustainability trends (40% of score) These trends are
 - Population Growth and Resource Scarcity
 - Growth in Emerging Markets
 - Increased demand for Sustainable Products
- C) Financial robustness (20% of score): based on Piotroski F-score

The companies that perform best in this screen can generally be said to demonstrate: - solution based products and services relative to exposure to growth markets by sector/region - risk management quality relative to risk exposure (sector/region) - efficient use of resources relative to resource constraints

Norms-based screening

Screened by

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

Description

The Storebrand Standard is described under negative/exclusion screening above, which is based on a range of international conventions (all relevant conventions are listed in a detailed framework document for each topic).

LEI 06.2	Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
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The negative and norms-based screening criteria have been developed over the past 20 years, mainly by in-house ESG analysts, with the support of external expert advice. Important clients have also been included in the development of criteria.

The Storebrand Standard has been approved by the Executive Committee. Clients are informed of major changes through news letters, KAMs, and/or tailored reporting. The standard is reviewed continually with changes being made to existing criteria or new criteria being implemented. In 2016 the standard was strengthened further regarding coal exclusions and also product safety criteria which was implemented as an extension to our human rights criteria. Both changes have resulted in additional exclusion in the course of the year.

The sector research (positive screening) has been developed over the past 20 years, mainly by in-house ESG analysts, in cooperation with CIO and portfolio managers. continuously improved by the ESG research team. In 2016 more focus has been put on opportunity/product based indicators which apply to a smaller number of companies within a sector.

The extra fossil free criteria to the Storebrand standard was further specified during the course of 2016 in response to ongoing client dialogue. Definitions of fossil production and distribution have been clarified and explained in greater detail.

LEI 07	Mandatory	Public	Core Assessed	PRI 1
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LEI 07.1	Indicate which processes your organisation uses to ensure screening is based on robust analysis.
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- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Other, specify
- None of the above

(B) Implementation: Thematic

LEI 09	Mandatory	Public	Descriptive	PRI 1
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LEI 09.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.
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- Environmentally themed funds
- Socially themed funds
- Combination of themes

LEI 09.2	Describe your organisation's processes for sustainability themed funds. [Optional]
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The mutual fund Storebrand Trippel Smart/SPP Global Topp 100 is a global equity fund, investing in the top 100 performers across sectors and regions (sector neutral). Companies are selected on the basis on their Sustainability Rating, relative to sector peers. Please see previous descriptions of ESG sector research and Sustainability Ratings.

The family of Plus funds SPP Sweden Plus, SPP Global Plus and SPP Emerging Markets Plus are fossil free funds that were launched between March and September 2016. These funds are low risk (<1 in tracking error), model based equity funds that have the following characteristics

- Fossil free: Based on a screen from data provider Trucost that excludes all companies with over 5% revenue from the production and/or distribution of fossil fuels
- Optimised on sustainability rating (higher average sustainability score than index)
- Optimised on carbon footprint (significantly lower than index)
- Invests in 5-10% climate solutions portfolio

(C) Implementation: Integration of ESG issues

LEI 10	Mandatory	Public	Core Assessed	PRI 1
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LEI 10.1

Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.

ESG issues	Coverage/extent of review on these issues
Environmental	<div style="background-color: #0070C0; color: white; padding: 2px; display: flex; align-items: center;"> Environmental </div> <p><input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly</p> <p><input type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly</p> <p><input type="radio"/> We do not review environmental issues</p>
Social	<div style="background-color: #0070C0; color: white; padding: 2px; display: flex; align-items: center;"> Social </div> <p><input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly</p> <p><input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly</p> <p><input type="radio"/> We do not review social issues</p>
Corporate Governance	<div style="background-color: #0070C0; color: white; padding: 2px; display: flex; align-items: center;"> Corporate Governance </div> <p><input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly</p> <p><input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly</p> <p><input type="radio"/> We do not review corporate governance issues</p>

LEI 10.2

Additional information. [Optional]

Our In house Sustainable Investment team performs annual analyses of

- The most important ESG international trends, based on literature review
- The KPI's used (E,S and G) used in sector analyses. The sector analyses conducted are the basis for the internal Sustainability rating 0-100.

External financial research providers only occasionally review the potential significance of ESG issues.

The Norwegian equities team performs an ongoing analyses of portfolio companies, primarily on corporate governance issues.

ESG incorporation in passively managed listed equities

LEI 13	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1
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LEI 13.1

Indicate if you manage passive listed equity funds that incorporate ESG issues in the index construction methodology.

Yes

LEI 13.2

Indicate the percentage of your total passive listed equity funds for which ESG issues are incorporated in the index construction methodology.

(% of total passive listed equity funds)

- <10%
- 10-50%
- 51-90%
- >90%

LEI 13.3

Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategies you apply.

Index/fund 1

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
The screening criteria and process that applies to Storebrand's internally managed listed equity, applies to all of Storebrand's passively managed listed equity funds and portfolios. See questions LEI 06 and 07 for more information.	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

Index/fund 2

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
P8103: SPP Traditional Life portfolio: The average sustainability rating of the index portfolio is enhanced through systematic selection of companies with higher sustainability rating where possible. It is possible to achieve a 10% higher average sustainability score while keeping tracking error within acceptable levels for an index near portfolio. Implemented since March 2015.	<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

Index/fund 3

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
P982: Norway Traditional Life portfolio See description of methodology over.	<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

Index/fund 4

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
P993: Norway Deposit Portfolio See description of methodology over.	<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

Index/fund 5

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
SPP Plus fund family: SPP Global Plus, SPP Sweden Plus, SPP Emerging Markets Plus - fossil free funds. Exclude companies with over 5% revenue from production and/or distribution of fossil fuel - optimised on sustainability rating (over benchmark) - optimised on carbon footprint (significantly under benchmark) - 5-10% portfolio invested in "global climate solutions" portfolio Under 1 in tracking error.	<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

No

Communication

LEI 17	Mandatory	Public	Core Assessed	PRI 2,6
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LEI 17.1

Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.

We disclose it publicly

Provide URL

<http://www.storebrand.no/site/stb.nsf/Pages/sustainable-investments-main.html>

Provide URL

<https://www.storebrand.no/en/investor-relations/annual-reports>

LEI 17.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes
- No

LEI 17.3

Indicate the information your organisation proactively discloses to the public regarding your approach to ESG incorporation.

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

LEI 17.4

Indicate how frequently you typically report this information to the public.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested

LEI 17.5

Indicate the information your organisation proactively discloses to clients/ beneficiaries regarding your approach to ESG incorporation.

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

LEI 17.6

Indicate how frequently you typically report this information to clients/beneficiaries.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested
- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries

LEI 17.7

Additional information. [Optional]

A broad description of Storebrand's approach to sustainable investments is provided on our web site, including methodology, case studies and statistics.

An exclusion list of the companies Storebrand has excluded from its investment universe is published quarterly on the Storebrand/SPP web site.

The carbon footprint of all equities funds is also published quarterly on our website.

Certain clients receive quarterly reporting. Upon request, any clients are entitled to more detailed information on sector research, active ownership strategies and results, and/or exclusion strategies and results. The information is presented in reports, meetings, by emails or social media.

In 2016 the new bi-annual client magazine "The Globe" was launched in order to provide clients with up to date information on macro trends, internal analyses and prioritised work streams.

Storebrand Asset Management

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

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Engagement

Overview

LEA 01	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1	Indicate whether your organisation has a formal engagement policy.
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Yes

LEA 01.2	Indicate what your engagement policy covers:
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- Conflicts of interest
- Prioritisation of engagements
- Transparency
- Environmental factors
- Social factors
- Governance factors
- Engagements following on from decisions
- Other, describe
- None of the above

LEA 01.3	Attach or provide a URL to your engagement policy. [Optional]
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URL

<https://www.storebrand.no/en/sustainability/guidelines/attachment/4823?ts=15457c4c9f3>

LEA 01.4	Provide a brief overview of your organization's approach to engagement
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Active ownership and engagement is an important part of Storebrand's approach to sustainable investments. During Q4 2016, Storebrand carried out an evaluation of its active ownership and engagement practices in order to align them better with Storebrand group's purpose, "A future to look forward to" and the values that come with it. As a result, our investment policy is being updated to reflect that our main objectives to reduce risk, safeguard and create value on behalf of shareholders also explicitly refer to environmental, social and governance value. Creating financial value for our clients is important but it is also extremely important that the world and planet where our clients retire is a good place to live in. Accordingly, in 2017 we are adapting our engagement strategy from redressing wrongs to actually having a positive impact

Our former Governance Committee which oversaw the framework and principles for active ownership/engagement and especially controversial cases has become an Engagement committee. Its role is more active since it supervises, selects and prioritizes all engagement cases with special focus on theme proactive engagement. It includes financial analysts as well as ESG analysts and the head of Storebrand Asset Management. It reports to the board.

○ No

LEA 01.5 Additional information [optional]

Adapting our engagement strategy from redressing wrongs to actually having a positive impact results in a new active ownership/engagement strategy where we prioritize engagements where we think we can have a better opportunity to obtain good results and we have allocated more time and resources to those. This means better quality engagements with fewer companies for longer periods of time and when possible with other investors for more leverage. This also allows for more proactive engagement since our resources are not used on every controversial case (reactive engagement).

Engagement activities continue to be based on the Norwegian and Swedish Governance Codes, as well as the EU Shareholder Rights Directive. Storebrand is a member of the Norwegian Committee for Corporate Governance which outlines Best Practice for Norwegian companies and provides a solid basis for engagement. Our main form of active ownership is direct dialogue with companies alone or together with other investors, with a focus, but not exclusively, in Norway and Sweden.

LEA 02 **Mandatory** **Public** **Gateway** **PRI 1,2,3**

LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual/Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers

Process

Process for engagements run internally

LEA 03	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.
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Yes

LEA 03.2	Describe the criteria used to identify and prioritise engagement activities carried out by internal staff.
-----------------	--

- Geography/market of the companies targeted
- Materiality of ESG factors
- Systemic risks to global portfolios
- Exposure (holdings)
- In reaction to ESG impacts which has already taken place
- As a response to divestment pressure
- As a follow-up from a voting decision
- Client request
- Other, describe

No

LEA 03.3	Additional information. [Optional]
-----------------	------------------------------------

Storebrands policy for engagement and active ownership states that resources will be channelled and prioritised to the following companies

- companies where Storebrand's equity share is over 3% in Norway and 0.7% in Sweden
- companies involved in controversial cases, including governance, environmental and social issues
- companies where the equity share of individual funds is over 5%

Storebrand will mainly address the following topics: incentive structures, capital utilisation, board composition, board member ownership, corruption and economic crime, human rights and international humanitarian law, severe climate- and environmental degradation.

Activities will be prioritised with respect to significance of ownership, risk and/or relevance to value creation, including positive impact. Activities will normally be decided and conducted by responsible portfolio managers (equity and fixed income) and/or ESG analyst. The Engagement Committee oversees framework and policies in this area in addition to supervise, select and prioritize all engagement cases. There is a special focus on theme proactive engagement. It is also a place where active ownership/engagement best practice is discussed. The committee includes financial analysts as well as ESG analysts and the head of Storebrand Asset Management.

Policies/procedures specific to ESG analysts: 3500 companies are monitored by a sustainability data provider to detect potential violations with the Storebrand Standard. The data provider is also in contact with these companies to include all company measures and corporate behaviour changes regarding all potential violations of the Storebrand standard. Potential violation cases where possibilities for changed corporate behaviour are detected are sent by the ESG team to the Engagement Committee for review. The ESG team will also send for review potential theme engagement cases that are detected as opportunity or risk for an industry during our biannual sustainability rating analysis of all companies in our investment universe.

Prior to each engagement process, specific goals are established for the engagement process, in order to ensure clear communication with investees as well as ease the measurement of engagement success. ESG analysts record the level of engagement success in each engagement process. There are four steps, where the fourth level is aligned with the UN PRI definition of success: "The measures taken were all or mostly completed after Storebrand contacted the company". Hence, we can assume our engagement efforts have

contributed to the improvement, although it is rarely possible to determine with certainty Storebrand's particular effect on the outcome.

In instances where the engagement process does not lead to the required improvement *in reactive engagement processes*, Storebrand may exclude a company from investments (Storebrand Standard). In case of exclusion, formal reporting procedures are in place to inform both company, portfolio managers, as well as in-house compliance officers.

Excluded companies are reviewed regularly (every six months), in order to request information on any improvements and/or seek to establish a dialogue.

LEA 04	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 04.1 Indicate if you define specific objectives for your engagement activities.

- Yes
 - Yes, for all engagement activities
 - Yes, for the majority of engagement activities
 - Yes, for a minority of engagement activities
- We do not define specific objectives for engagement activities carried out by internal staff.

LEA 04.2 Indicate if you monitor the actions that companies take following your engagements.

- Yes
 - Yes, in all cases
 - Yes, in the majority of cases
 - Yes, in the minority of cases
- We do not monitor the actions that companies take following engagement activities carried out by internal staff.

LEA 04.3 Indicate whether your organisation defines milestones and goals for engagement activities carried out by internal staff.

- Yes
- No

LEA 04.5 Additional information. [Optional]

The goals of each engagement have usually been in the area of measures to remedy any violation of the Storebrand Standard (reactive engagement); measures to reduce the risk of recurrence; as well as reporting on these measures publicly. The specific goals may be adjusted, usually enhanced and/or detailed, as the engagement process proceeds.

Ideally, the measures taken by the company should meet best practice standards. However, a reactive engagement is terminated if the company complies with the initial requirements and the risk of recurrence is considered to be reduced to an acceptable level. Typically, we would expect company to meet industry average level.

Storebrand measures and registers all engagement with companies on the following internal scale.

Level 1: Company contacted (explanation of concerns+ request for company practice improvement); no response

Level 2: Company contacted; unsatisfactory response

Level 3: Company contacted: satisfactory response

Level 4: Company contacted: Improved business practice

In 2016 Storebrand's focus has been on increasing the amount of proactive engagements. These engagements can have different goals and a milestone evaluation approach (from basic to advanced practice) might be used; However, so far, we are measuring progress by using the same scale depending on how receptive the company is to achieve those goals.

The progress of engagement is discussed in a monthly meeting in the Sustainable Investment team including minimum requirements, alternative approaches to achieve or improve dialogue, and whether or not to escalate an engagement.

Escalation of engagement, if the company does not meet our minimum requirements (or communicate such actions), after repeated attempts at dialogue. "Escalate" might be to contact executive level staff at domestic offices to obtain contact with headquarter staff, involve Storebrand executives in the dialogue, collaborate with other investors etc. As a last resort, the case will be presented before the Sustainable Investment Committee, to make a final decision on whether or not to exclude the company from investments. If excluded, the company is always informed of the decision, and contacted regularly afterwards to encourage improvement.

Process for engagements conducted via collaborations

LEA 05	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 05.1 Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements

Yes

LEA 05.2 Describe the criteria used to identify and prioritise collaborative engagements

- Potential to learn from other investors
- Ability to add value to the collaboration
- Geography / market of the companies targeted
- Materiality of ESG factors
- Systemic risks to global portfolios
- Exposure (holdings)
- In response to ESG impacts which has already taken place
- In response to divestment pressure
- Client requests
- Other, describe

No

LEA 06	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 06.1

Indicate if you define specific objectives for your engagement activities carried out collaboratively.

- Yes
 - Yes, for all engagement activities
 - Yes, for the majority of engagement activities
 - Yes, for a minority of engagement activities
- We do not define specific objectives for engagement activities carried out collaboratively.

LEA 06.2

Indicate if you monitor the actions companies take following your collaborative engagements.

- Yes
 - Yes, in all cases
 - Yes, in the majority of cases
 - Yes, in the minority of cases
- We do not monitor the actions that companies take following engagement activities carried out collaboratively

LEA 06.3

Indicate whether your organisation defines milestones and goals related to engagement activities carried out via collaborations.

- Yes

LEA 06.4

Indicate if you do any of the following to monitor and evaluate the progress of your collaborative engagement activities.

- Define timelines for milestones and goals
- Tracking, monitoring progress against defined milestones and goals
- Establish a process for when the goals are not met
- Revisit and, if necessary revise the goals on a continuous basis
- Other, please specify
- No

LEA 06.5

Additional information. [Optional]

Monitoring and evaluation of progress depends on the type of collaborative engagement. For engagements aimed to raise the practice of an industry, we might use a milestone evaluation approach (from basic to advanced practice), and companies are benchmarked against each other. In engagements requiring a specific corporate action (i.e. withdrawing from a territory, cleaning up a polluted area, enforcing a judgment), progress is evaluated by responsiveness of the company/companies and actions taken to meet our demands. The objective is not met until the company/companies actually perform(s) the specific activity.

In most collaborative engagements, we seek to define a specific time period. If there is limited progress, we may decide to escalate the engagement, or, alternatively decide to leave the collaborative engagement and divest (if in breach of the Storebrand Standard).

Collaborative engagements provide an opportunity for industry insights. This information has proven useful when designing KPIs for sector research and/or in the process of selecting top performers and divesting from high risk companies.

General processes for all three groups of engagers

LEA 10

Mandatory

Public

Gateway

PRI 2

LEA 10.1

Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track
Collaborative engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track and cannot estimate our engagements

LEA 10.2

Additional information. [OPTIONAL]

Engagement is tracked and registered in our internal CRM system.

Communication

LEA 16

Mandatory

Public

Core Assessed

PRI 2,6

LEA 16.1

Indicate whether your organisation proactively discloses information on its engagements.

We disclose it publicly

provide URL

<https://www.storebrand.no/en/sustainability/active-ownership>

LEA 16.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes

No

LEA 16.3

Indicate what engagement information your organisation proactively discloses to the public.

- Details of the selections, priorities and specific goals of engagement
- Number of engagements
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the engagement
- Outcomes that have been achieved from the engagement
- Other information

LEA 16.4

Indicate how frequently you typically report engagements information to the public.

- Disclosed continuously (prior to and post engagements)
- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Ad-hoc/when requested

LEA 16.5

Indicate what engagement information your organisation proactively discloses to clients/beneficiaries.

- Details of the selections, priorities and specific goals of engagement
- Number of engagements
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the engagement
- Outcomes that have been achieved from the engagement
- Other information

LEA 16.6

Indicate how frequently you typically report engagements information to clients/beneficiaries.

- Disclosed continuously (prior to and post engagements)
- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Ad hoc/when requested

LEA 16.7

Describe any other differences in the information being disclosed. [Optional]

Storebrand discloses key examples of engagement processes on the home page with a short description of the case and outcome. However, in 2017 we intend to disclose more examples as well as priorities and specific goals.

- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries.

(Proxy) voting and shareholder resolutions

Overview

LEA 17

Mandatory

Public

Gateway

PRI 1,2,3

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 17.1

Indicate whether your organisation has a formal voting policy.

- Yes

LEA 17.2

Indicate what your voting policy covers:

- Conflicts of interest
- Prioritisation of voting activities
- Transparency
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Filing/co-filing resolutions
- Extraordinary meetings
- Share blocking
- Regional voting practices
- Record keeping
- Company dialogue pre/post vote
- Securities lending process
- Other, describe
- None of the above

LEA 17.3

Attach or provide a URL to your voting policy. [Optional]

URL

<https://www.storebrand.no/en/sustainability/guidelines/attachment/4823?ts=15457c4c9f3>

LEA 17.4 Provide a brief overview of your organization’s approach to (proxy) voting.

Storebrands prioritises its presence and voting at AGMs to the following companies:

- companies where Storebrand's equity share is over 3% in Norway and 0.7% in Sweden
- companies involved in controversial cases, including governance, environmental and social issues
- companies where the equity share of individual funds is over 5%

Storebrand will mainly address the following topics: incentive structures, capital utilisation, board composition, board member ownership, corruption and economic crime, human rights and international humanitarian law, severe climate- and environmental degradation.

Activities will be prioritised with respect to significance of ownership, risk and/or relevance to value creation, including positive impact.

LEA 17.5 Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

Storebrand is deeply involved in voting activities in the Norwegian market, primarily on governance and transparency issues. In 2016, Storebrand voted at odds with one company administration.

Weifa ASA 31.05.2016
Case 9. Power of attorney to issue shares

No

Process

LEA 18 Mandatory Public Descriptive PRI 2

LEA 18.1 Indicate how you typically make your (proxy) voting decisions.

Approach

© We use our own research or voting team and make voting decisions without the use of service providers.

Based on

- our own voting policy
- our clients' requests or policy
- other, explain
- We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.
- We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) that make voting decisions on our behalf.

LEA 18.2 Additional information.[Optional]

Storebrand's main tool in active ownership is direct dialogue with companies. It is our experience that direct dialogue (i.e. by qualified personnel) is a resource efficient way of achieving improvements, and one that is also valued by the corporates of which we hold equities or bonds.

Voting activities are thus limited to domestic markets, and follow the Governance Code and prioritised issues as described earlier.

Voting is performed via third party, but any voting processes require significant quality control at several stages by in-house resources, both in Operations and Front Office.

LEA 22	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 22.1 Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting

- Yes, in most cases
- Sometimes, in the following cases:
- Neither we nor our service provider raise concerns with companies ahead of voting

LEA 22.2 Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations.

- Yes, in most cases
- Sometimes, in the following cases.
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

Outputs and outcomes

LEA 23	Mandatory	Public	Core Assessed	PRI 2
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LEA 23.1	For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.
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- We do track or collect this information
- We do not track or collect this information

LEA 24	Mandatory	Public	Additional Assessed	PRI 2
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LEA 24.1	Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.
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- Yes, we track this information
- No, we do not track this information

Communication

LEA 27	Mandatory	Public	Core Assessed	PRI 2,6
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LEA 27.1	Indicate if your organisation proactively discloses information on your voting activities.
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- We disclose it publicly

	provide URL
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<https://www.storebrand.no/en/sustainability/active-ownership>

LEA 27.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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- Yes

LEA 27.3	Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.
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	Indicate how much of your voting record you disclose
--	--

- All voting decisions
- Some voting decisions
- Only abstentions and opposing vote decisions
- Summary of votes only

Indicate what level of explanation you provide

- Explain all voting decisions
- Explain some voting decisions
- Only explain abstentions and votes against management
- No explanations provided

LEA 27.4

Indicate how frequently you typically report voting information.

- Continuously (primarily before meetings)
 - Continuously (soon after votes are cast)
 - Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad-hoc/as requested
- No
- We disclose it to clients/beneficiaries only
 - We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

Storebrand Asset Management

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

ESG incorporation in actively managed fixed income

Implementation processes

FI 04	Mandatory	Public	Gateway	PRI 1
FI 04.1	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.			

SSA	<table border="1"> <tr> <td data-bbox="448 226 579 293">100</td> <td data-bbox="579 226 1458 293">Screening alone</td> </tr> <tr> <td data-bbox="448 371 579 439">0</td> <td data-bbox="579 371 1458 439">Thematic alone</td> </tr> <tr> <td data-bbox="448 517 579 584">0</td> <td data-bbox="579 517 1458 584">Integration alone</td> </tr> <tr> <td data-bbox="448 663 579 730">0</td> <td data-bbox="579 663 1458 730">Screening + integration strategies</td> </tr> <tr> <td data-bbox="448 808 579 875">0</td> <td data-bbox="579 808 1458 875">Thematic + integration strategies</td> </tr> <tr> <td data-bbox="448 954 579 1021">0</td> <td data-bbox="579 954 1458 1021">Screening + thematic strategies</td> </tr> <tr> <td data-bbox="448 1099 579 1167">0</td> <td data-bbox="579 1099 1458 1167">All three strategies combined</td> </tr> <tr> <td data-bbox="448 1245 579 1312">0</td> <td data-bbox="579 1245 1458 1312">No incorporation strategies applied</td> </tr> <tr> <td data-bbox="448 1357 579 1402">100%</td> <td></td> </tr> </table>	100	Screening alone	0	Thematic alone	0	Integration alone	0	Screening + integration strategies	0	Thematic + integration strategies	0	Screening + thematic strategies	0	All three strategies combined	0	No incorporation strategies applied	100%	
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0	Screening alone																		
5	Thematic alone																		
0	Integration alone																		
95	Screening + integration strategies																		

	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
		100%

FI 04.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Screening: Storebrand has chosen a comprehensive screening approach that covers all fixed income investments to reduce the risk of being involved in or supporting unethical/irresponsible business practices. See explanation below for corporate and sovereign bonds

Thematic: Storebrand has developed a market leading approach to investments in Green Bonds to enable our clients to invest in climate/social solutions. A European first Green Bond fund was launched in Sweden in March 2015 and now has just under 3 billion SEK in AUM.

Integration: The Sustainable Investment team has, together with portfolio managers identified risk based issues that are most relevant to global bond markets. As a result, tailored corruption analyses are delivered from the sustainability team to PM's.

FI 04.3 Additional information [Optional].

Screening for Corporate Bonds

Corporate Bonds are covered by the Storebrand Standard which has been explained earlier in the equities sections.

Screening for Sovereign Bonds

Storebrand aims to invest in corporations and countries that contribute actively to sustainable development. We believe such practices - when integrated in core business - will be financially rewarded. Based on this, Storebrand will not invest in government bonds from countries that

Are systematically corrupt Systematically suppress basic political and civil rights Are subject to sanctions imposed by the UN Security Council

As a responsible long term investor, with a geographically diverse investment portfolio, it is in Storebrand's interests to promote good governance, stability and the maintenance of basic political and civil rights. Therefore Storebrand's goal is to avoid purchasing bonds from governments that are systematically corrupt, unstable and/or oppressive. To achieve this goal, Storebrand utilizes two corruption indexes, a political and civil rights index and the list of countries subject to UN Security Council sanctions. The indexes and lists chosen are issued by reliable and well respected sources, are methodically rigorous and are updated regularly.

Corruption indexes

Transparency International's Corruption Perceptions Index (CPI), published annually since 1995, has been widely credited for putting the issue of corruption on the international policy agenda. The CPI ranks almost 200 countries in terms of perceived levels of corruption, as determined by expert assessments and opinion surveys. These

assessments and surveys include questions relating to bribery of public officials, kickbacks in public procurement, embezzlement of public funds, and questions regarding the strength and effectiveness of public sector anti-corruption efforts. http://www.transparency.org/policy_research/surveys_indices/cpi

The World Bank Worldwide Governance Indicators; Control of Corruption Index has been published annually since 1996. The index captures perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption and "capture" of the state by elites and private interests. Information to put together the index is obtained from business providers, surveys of firms and households, non-governmental organisations and public sector data providers. Exclusion criterion: Countries ranking among the 10 percent worst performers on the Transparency International CPI index and/or the World Bank Control of Corruption index will be excluded from investments at Storebrand. The 10 percent threshold includes any country with the same numerical score as the best performer of the group.

Political and Civil Rights Index

Freedom House Freedom in the World index has been published annually since 1972 and ranks over 200 countries and disputed territories countries according to political and civil rights and freedom. To compile the index, analysts used a broad range of sources of information, including foreign and domestic news reports, academic analyses, non-governmental organizations and visits to the region. Exclusion criterion: Countries and territories which are given the lowest rating of 7 will be excluded from investments at Storebrand. Countries are given a rating of 7 when political and civil rights are absent or virtually nonexistent and the nature of the regime is characterised by severe oppression.

UN Sanctions

Under Article 41 of the UN Charter, the UN Security Council may call upon Member States to apply measures not involving the use of armed force in order to maintain or restore international peace and security. Such measures are commonly referred to as sanctions. Current practice at the UN Security Council is to impose targeted measures aimed at removing the circumstances that have led to a threat to, or breach of, international peace and security. Exclusion criterion: Countries that are subject to sanctions imposed by the UN Security Council will be excluded from investments at Storebrand. Countries will not be excluded in cases where sanctions are targeted specifically at independent groups within a country and not at the government of the country.

FI 06	Mandatory	Public	Additional Assessed	PRI 1
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FI 06.1	Indicate how you ensure that your ESG research process is robust:
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- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

FI 06.2 Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, ‘tear sheets’, ‘dashboards’ or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

FI 06.3 Additional information. [Optional]

Both exclusion lists and ESG ratings are read into company databases quarterly and are available to all investment staff.

Formal fund review meetings are conducted annually where sustainability indices are a central part of the discussion. Portfolio Managers are required to explain investment in poor ESG performers and the fund’s overall sustainability rating is assessed relative to peers.

(A) Implementation: Screening

FI 07	Mandatory	Public	Gateway	PRI 1
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FI 07.1 Indicate the type of screening you conduct.

Select all that apply

	SSA	Corporate (financial)		
Negative/exclusionary screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Positive/best-in-class screening	<input type="checkbox"/>	<input type="checkbox"/>		
Norms-based screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

FI 07.2 Describe your approach to screening for internally managed active fixed income

Negative and Norm based screening

The Storebrand Standard applies to all internally managed funds and portfolios, including all Fixed Income investments, and covers:

- 1) Product related exclusions: controversial weapons (landmines, cluster munitions, nuclear weapons, chemical/biological weapons) and tobacco
- 2) Controversial issues: human rights and international humanitarian law, corruption and economic crime, environmental degradation
- 3) Sector specific exclusions: lowest performing companies in high risk industries + climate related (companies with over 30% of revenues from coal, oil sand companies, palm oil companies causing deforestation).

As of Q4 2016 178 companies were excluded.

Positive/Best in Class screening

The Storebrand Sustainability rating covering 2500 companies also includes fixed income funds and portfolios. Ratings are on a 1-100 scale and consist of companies ESG practice, financial robustness and positioning for global sustainability trends. Analyses leading to the rating are sector based. Some types of bonds (Norwegian regional banks, Swedish Covered Bonds and Bonds issued by Norwegian/Swedish communes are given a group score based on ratings from the Financial sector.

On the basis of this sustainability rating, fixed income funds are rated on a scale of 1-10.

FI 08	Mandatory	Public	Descriptive	PRI 1
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FI 08.1	Indicate why you conduct negative screening.
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SSA

	SSA
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- For legal reasons
- For non-legal reasons

Corporate (financial)

	Corporate (fin)
--	-----------------

- For legal reasons
- For non-legal reasons

FI 08.2	Describe your approach to ESG-based negative screening of issuers from your investable universe.
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Storebrand aims to ensure that its clients assets are not exposed to companies that breach international norms and conventions, including breaches of humanitarian law, human rights, labor rights, corruption guidelines and environmental laws. From a legal perspective Storebrand believes that it has a duty under the UN Guiding Principles for Business and Human Rights to avoid being complicit in breaches of human rights and humanitarian law.

FI 10	Mandatory	Public	Core Assessed	PRI 1
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FI 10.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
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Type of screening	Checks
Negative/exclusionary screening?	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Norms-based screening	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

FI 10.2	Additional information. [Optional]
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Quarterly reports with updated exclusion ratings and ESG ratings are sent from the Sustainability team to Compliance functions. Automated, daily compliance checks for both Storebrand Standard (exclusions) and ESG rating thresholds are conducted. If breaches of the exclusion criteria are found fund managers are immediately notified and required to rectify the breach. Compliance breaches of the Storebrand standard are reported at board level. Compliance breaches of ESG fund rating thresholds are followed up in internal periodical fund review meetings.

(B) Implementation: Thematic

FI 12	Mandatory	Public	Core Assessed	PRI 1
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FI 12.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles:
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- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

FI 12.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.
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A misuse of bond proceeds would prompt direct contact with the issuer by the fund manager.

FI 13	Mandatory	Public	Additional Assessed	PRI 1
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FI 13.1	Indicate how you assess the environmental or social impact of your thematic investments
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- We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- We ensure independent audits are conducted on the environmental or social impact of our investments
- We have a proprietary system to measure environmental and social impact
- We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- Other, specify
- None of the above

FI 13.2	Additional information. [Optional]
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Storebrand requires reporting from issuers of Green Bonds in line with the Green Bond Principles.

(C) Implementation: Integration

FI 14	Mandatory	Public	Descriptive	PRI 1
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FI 14.1	Describe your approach to integrating ESG into traditional financial analysis.
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The sustainability team rates 2500 issuers with an ESG rating of 0-100. Each issuer is rated on 70 to 100 individual indicators. These indicators form the basis for integration of ESG issues into traditional financial analyses. Storebrand seeks to tailor the ESG input to Portfolio Managers according to the unique set of risks and opportunities that are relevant for portfolio companies.

	Corporate (financial)
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Corporate risk is focused heavily on Governance issues. The Storebrand sustainability team has, together with portfolio managers, identified corruption as a key financially material ESG factor in corporate bonds and delivers specific corruption analysis on portfolio companies in specific funds. By using the analysis provided portfolio managers are able to limit exposure to companies classified as high risk.

FI 15	Mandatory	Public	Core Assessed	PRI 1
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FI 15.1	Indicate how ESG information is typically used as part of your investment process.
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Select all that apply

	Corporate (financial)		
ESG analysis is integrated into fundamental analysis	<input type="checkbox"/>		
ESG analysis is integrated into security weighting decisions	<input checked="" type="checkbox"/>		
ESG analysis is integrated into portfolio construction decisions	<input checked="" type="checkbox"/>		
ESG analysis is a standard part of internal credit ratings or assessment	<input type="checkbox"/>		
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input checked="" type="checkbox"/>		
ESG analysis is regularly featured in internal research notes or similar	<input type="checkbox"/>		
ESG analysis is a standard feature of ongoing portfolio monitoring	<input checked="" type="checkbox"/>		
ESG analysis features in all internal issuer summaries or similar documents	<input type="checkbox"/>		
Other, specify	<input type="checkbox"/>		

FI 16	Mandatory	Public	Additional Assessed	PRI 1
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FI 16.1 Indicate the extent to which ESG issues are reviewed in your integration process.

	Environment	Social	Governance
Corporate (financial)	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

Corporate (financial)

All ESG factors are systematically reviewed for financial relevance by the sustainable investment team. However Governance factors have been selected for further development because of the growing body of literature that points to the specific relevance of this pillar in fixed income management.

Communication

FI 23

Mandatory

Public

Core Assessed

PRI 2,6

FI 23.1

Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.

We disclose it publicly

Provide URL

<https://www.storebrand.no/en/sustainability/our-method>

Provide URL

<https://www.storebrand.no/en/sustainability/exclusions>

FI 23.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes

FI 23.3

Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

FI 23.4

Indicate how frequently you typically report this information.

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad-hoc/when requested
- No
- We disclose it to clients and/or beneficiaries only
 - We do not proactively disclose it to the public and/or clients/beneficiaries

FI 23.7

Additional information. [Optional]

A broad description of Storebrand's approach to sustainable investments is provided on our web site, including some case studies and statistics.

Certain clients receive quarterly reporting. Upon request, any clients are entitled to more detailed information on sector research, active ownership strategies and results, and/or exclusion strategies and results. The information is presented in reports, meetings, by emails or social media.

In addition sustainability ratings on fixed income funds are available on the Storebrand fund platform. Clients can easily access both the ratings from 1-10 and an explanation of the ratings system. ratings are updated on a quarterly basis.