

Product name: SEB Pension Fund Extra

Legal entity identifier: 549300QCWZY01HZG0135

Environmental and/or social characteristics

Sustainable investment: means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Did this financial product have a sustainable investment objective?

☒ Yes

☐ No

☐ It made sustainable investments with an environmental objective: %

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made sustainable investments with a social objective: %

☒ It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 41.50% of sustainable investments

☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☒ with a social objective

☐ It promoted E/S characteristics, but did not make any sustainable investments

To what extent were the environmental and/or social characteristics promoted by this financial product met?

During the 2024 reference period, the Sub-Fund has promoted environmental and/or social characteristics primarily through investments in other financial products (fund units) in the following ways:

- By prioritising investments in funds classified as Article 8 or Article 9 under Regulation (EU) 2019/2088 (SFDR).
- By prioritising investments in funds whose sustainability work aligns predominantly with the Management Company's sustainability policy.
- By investing in funds from management companies that have signed the UN Principles for Responsible Investment (PRI).
- By striving for a high proportion of sustainable investments.
- By influencing companies, primarily via underlying funds within the Management Company or strategies managed by the Management Company, to adopt more sustainable practices.

For more information about the Management Company's sustainability policy, exclusion criteria, methodology for assessing sustainable investments, and the SIMS-S sustainability model, please visit: [Our sustainability approach at Asset Management | SEB](#)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

How did the sustainability indicators perform?

Exclusions	
Number of companies excluded from the investment universe index	Excluded share of investment universe index
3858	12.18%

SIMS-Score			
	The fund portfolio		Investment universe index
Market-weighted SIMS-Score	5.99		-
Coverage ratio	83.00%		-
The proportion of the fund's underlying fund units that follow an exclusion policy that substantially corresponds to Management Company's exclusion criteria			
100%			
The proportion of Management Company underlying fund units where the managing fund company has signed the UN Principles for Responsible Investment (PRI)			
100%			
Corporate engagements			
	Total number	Number of companies	Share of the portfolio
Dialogues	457	273	41.81%
Voting at general meetings	380	377	57.01%
Nomination committees	18	18	4.50%
Fund of Funds			
	Article 9		Article 8
Number of investments	1		14
Share of the portfolio	1.41%		98.59%
Sustainable investments			
	The fund portfolio		Investment universe index
Market-weighted share	41.50%		-
Degree of coverage	84.50%		-

● ...and compared to previous periods?

Exclusions			
	2024	2023	2022
Number of companies excluded from the investment universe index	3858	3493	-
Excluded share of investment universe index	12.18%	11.50%	14.00%
SIMS-Score			
	2024	2023	2022
The fund portfolio	5.99	6.00	5.90
Investment universe index	-	0.00	-

At the end of 2023, the Management Company changed its service provider to Morningstar Sustainalytics, potentially resulting in lower overall figures compared to 2023; however, the emphasis is now on quality over quantity.

The proportion of the fund's underlying fund units that follow an exclusion policy that substantially corresponds to Management Company's exclusion criteria
100%

The proportion of Management Company underlying fund units where the managing fund company has signed the UN Principles for Responsible Investment (PRI)
100%

Corporate engagements				
		2024	2023	2022
Dialogues	Total number	457	922	-
	Number of companies	273	410	95
	Share of the portfolio	41.81%	51.69%	-
Voting at general meetings	Total number	380	58	1
	Number of companies	377	307	1
	Share of the portfolio	57.01%	73.59%	-
Nomination committees	Total number	18	18	-
	Share of the portfolio	4.50%	4.72%	-

Sustainable investments

	2024	2023
The fund portfolio	41.50%	40.73%
Investment universe index	-	-

Fund within fund			
	2024	2023	2022
Share invested in Article 9	1.41%	0.76%	-
Share invested in Article 8	98.59%	97.00%	-

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

During the 2024 reference period, the Sub-Fund committed to making sustainable investments amounting to a minimum share of 10.00%.

The proportion of the Sub-Fund's sustainable investments during the 2024 reference period amounted to 41.50%, based on a weighted average of the Sub-Fund's sustainable investments per quarter.

Sustainability objectives defined by the Management Company

Social Objectives

- At least 20% of the company's revenues are assessed to contribute to global social goals directly or indirectly linked to the following UN SDGs:
 - SDG 1: No poverty
 - SDG 2: Zero hunger
 - SDG 3: Good health and well-being
 - SDG 4: Quality education
 - SDG 5: Gender equality
 - SDG 6: Clean water and sanitation
 - SDG 8: Decent work and economic growth
 - SDG 10: Reduced inequalities

- **SDG 11:** Sustainable cities and communities
- **SDG 16:** Peace, justice, and strong institutions

- Companies outperform peers in the same region on gender equality metrics based on quantitative data.
- Companies demonstrate a high contribution to and exposure to social objectives based on fundamental analysis.

Environmental objectives (aligned with the EU Taxonomy)

- At least 10% of the company's revenues, capital expenditures, or operational expenditures are assessed or reported to significantly contribute to one or more of the six objectives in the EU Taxonomy:
 - Climate change mitigation
 - Climate change adaptation
 - Sustainable use and protection of water and marine resources
 - Transition to a circular economy, including waste prevention and increased use of secondary raw materials
 - Pollution prevention and control
 - Protection and restoration of biodiversity and ecosystems

Environmental objectives not aligned with the EU Taxonomy

- At least 20% of the company's revenues contribute to global environmental goals, directly or indirectly linked to the following UN Sustainable Development Goals (SDGs):
 - **SDG 6:** Clean water and sanitation
 - **SDG 7:** Affordable and clean energy
 - **SDG 9:** Industry, innovation, and infrastructure
 - **SDG 11:** Sustainable cities and communities
 - **SDG 12:** Responsible consumption and production
 - **SDG 13:** Climate action
 - **SDG 14:** Life below water
 - **SDG 15:** Life on land
- Companies outperform their sector and region in emissions metrics based on quantitative data.
- Companies outperform their sector and region in resource efficiency areas such as water usage, raw material consumption, or waste production based on quantitative data.
- Companies demonstrate a high contribution to and exposure to environmental objectives based on fundamental analysis.

The use of proceeds bonds (green, social or sustainability bonds) are classified as sustainable investments provided that the issuer meets the requirements for social safeguards, complies with good corporate governance, and adheres to the Management Company's exclusion criteria. Green bonds supporting energy transition or other energy-efficiency projects are allowed even though the issuer is involved in fossil fuels above the normally accepted threshold according to the Management Company's Sustainability Policy.

The Management Company applies a "pass/fail methodology," where an entire investment is classified and reported as sustainable if it meets the requirement for contributing, social minimum safeguards, good governance, and avoiding significant harm.

● **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

To ensure that no sustainable investment caused significant harm to any environmental or social sustainability objective, the Sub-Fund undertook the following actions during the reference period:

- Excluded companies that did not comply with international norms and standards.
- Excluded companies operating in controversial sectors and business areas.
- Excluded companies with exposure to fossil fuels or other activities with a negative environmental impact.
- Excluded companies deemed not to meet the levels of social safeguards as defined by the EU Taxonomy.
- Relied on assessments from an external analysis partner regarding companies' governance structures, employment practices, tax compliance, and remuneration policies.

For underlying funds managed by external management companies, the Sub-Fund's Sustainability Policy is applied. Certain deviations may occur but are continuously monitored and may result in divestment.

● *How were the indicators for adverse impacts on sustainability factors taken into account?*

During the 2024 reference period, the Management Company's model for identifying companies with extreme values among indicators for adverse impacts was utilised to avoid investing in companies that cause significant harm.

The indicators for adverse impacts on sustainability factors applied are those described in Annex I of the technical standards of the Disclosure Regulation (CDR 2022/1288), as well as relevant indicators in Tables 2 and 3 of Annex I to CDR 2022/1288. These indicators are dependent on the current availability of data. However, where

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

sufficient data coverage existed, companies with significantly negative results in a geographical and sectoral context were excluded from being considered sustainable investments.

Some indicators were addressed through exclusions outlined in the Management Company's sustainability policy, which excludes:

- Companies operating in the fossil fuel sector;
- Companies with operations or facilities located in or near biodiversity-sensitive areas where their activities negatively impact these areas;
- Companies that fail to adhere to international norms and standards, such as the Ten Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises;
- Companies involved in the manufacturing or sale of controversial weapons (e.g. landmines, cluster munitions, chemical, and biological weapons);
- Companies whose activities negatively affect endangered species.

For underlying funds managed by external management companies, the Sub-Fund's Sustainability Policy is applied. Certain deviations may occur but are continuously monitored and may result in divestment.

● *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The Sub-Fund's investments during the reference period were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights through the norm-based exclusion criteria outlined in the Management Company's sustainability policy.

Norm-based exclusions mean that the management company expects issuers to comply with international laws and conventions, such as:

- The UN Principles for Responsible Investment (PRI);
- The Ten Principles of the UN Global Compact;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights, including the principles and rights established in the eight core conventions identified in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights.

Companies with verified violations were excluded and, therefore, could not be considered sustainable investments.

For underlying funds managed by external management companies, the Management Company's Sustainability Policy is applied. Certain deviations may occur but are continuously monitored and may result in divestment.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



How did this financial product consider principal adverse impacts on sustainability factors?

During the reference period, the Sub-Fund considered principal adverse impacts on sustainability factors through the exclusions described in the Management Company's sustainability policy, which excluded the following:

- Companies operating in the fossil fuel sector.
- Companies with facilities or operations located in or near biodiversity-sensitive areas where their activities negatively impact these areas.
- Companies that do not adhere to international norms and standards, such as the Ten Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.
- Companies involved in the production or sale of controversial weapons (landmines, cluster munitions, chemical, and biological weapons).
- Companies whose activities affect endangered species.

Sustainability assessment in the fundamental analysis process

In the fundamental analysis process, sustainability assessments were conducted on various aspects of each company, including its products, services, operations, and suppliers. To support the evaluation of companies' sustainability risks and opportunities, the fund managers utilised the management company's proprietary sustainability model, **SIMS-S**.

Through the application of SIMS-S, the following indicators for adverse impacts were considered:

- Greenhouse gas (GHG) emissions from the companies in which we invest.
- The carbon footprint of the companies in which we invest.
- The GHG intensity of the companies in which we invest.
- The proportion of companies operating in the fossil fuel sector.
- Energy consumption intensity by sector with significant climate impact, for the companies in which we invest.
- Whether the companies in which we invest have operations or projects located in or near biodiversity-sensitive areas where activities negatively impact these areas.
- Water emissions generated by the companies in which we invest.
- The volume of hazardous waste generated by the companies in which we invest.
- Whether the companies in which we invest lack processes and compliance mechanisms to monitor adherence to the UN Global Compact's Ten Principles and the OECD Guidelines for Multinational Enterprises.
- The unadjusted gender pay gap within the companies in which we invest.
- Gender diversity on the boards of the companies in which we invest.
- Whether the companies in which we invest have initiatives to reduce carbon emissions with the goal of aligning with the Paris Agreement.
- Whether the companies in which we invest have a supplier code of conduct addressing unsafe working conditions, insecure employment, child labour, and forced labour.

For underlying funds managed by external management companies, the Company's Sustainability Policy is applied. Certain deviations may occur but are continuously monitored and may result in divestment.



What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1/1/2024-12/31/2024

The Sub-Fund's weights are calculated excluding cash and cash-equivalents, which is why the weights in certain cases may appear slightly elevated.

Largest investments	Sector	% of assets	Country
SEB Sweden Equity Fund	-	8.49	Mixed
SEB Sverigefond Småbolag	-	5.65	Mixed
UI I-Montrusco Bolton Global Equity Fund	-	5.44	Mixed
SEB Obligationsfond SEK	-	4.94	Mixed
Morgan Stanley Investment Funds - Global Opportunity Fund	-	4.81	Mixed
Barrow Hanley Global Esg Value Equity Fund	-	4.72	Mixed
SEB Danish Mortgage Bond Fund	-	3.86	Mixed
Nvidia Corp	Information Technology	3.57	United States of America
Morgan Stanley Investment Funds - Global Asset Backed Securities Fund	-	3.55	Mixed
Apple Inc	Information Technology	3.15	United States of America
Twelve Capital Catbond Fund	-	2.71	Mixed

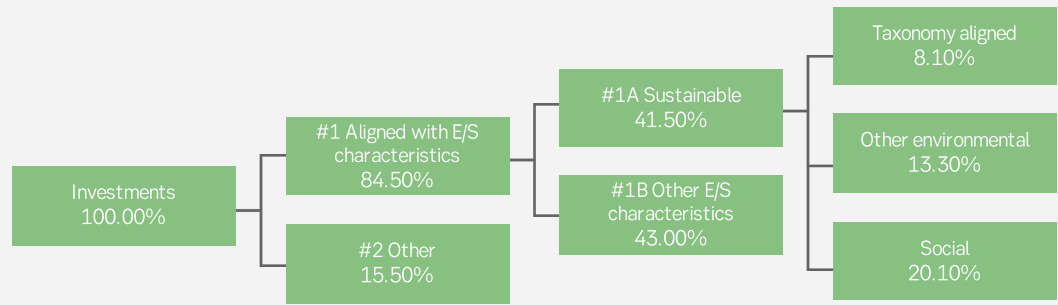


What was the proportion of sustainability-related investments?

The question is answered in the sub-questions below.

- **What was the asset allocation?**

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

-The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

-The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

● In which economic sectors were the investments made?

If present in the portfolio, sub-sectors related to fossil fuels, as defined in Article 2.62 Regulation (EU) 2018/1999, are disclosed. Otherwise, only top-level sectors are presented.

Sector	% assets
Mixed	52.69
Energy	0.00
Oil & Gas Refining & Marketing	0.00
Materials	1.54
Industrials	4.52
Consumer Discretionary	5.35
Consumer Staples	1.94
Health Care	5.88
Financials	6.14
Information Technology	14.57
Communication Services	4.42
Utilities	1.22
Real Estate	1.73



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The question is answered in the sub-questions below.

● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective — see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

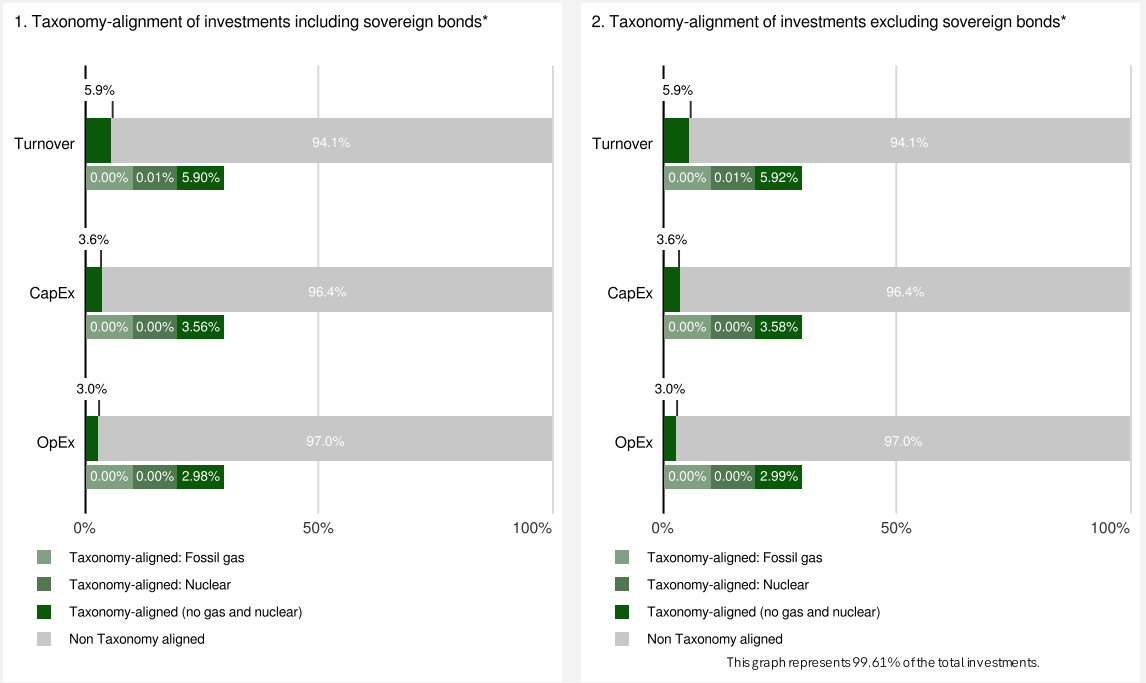
☒ Yes

☐ in fossil gas

☒ in nuclear energy

☐ No

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● What was the share of investments made in transitional and enabling activities?

During 2024, the share of investments in transitional activities was 0.01%. The share in enabling activities was 0.55%.

● How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

	Including sovereign bonds			Excluding sovereign bonds		
	2024	2023	2022	2024	2023	2022
Turnover	5.91%	0.97%	0.35%	5.93%	0.97%	0.14%
Capital expenditure	3.57%	1.69%	0.01%	3.58%	1.69%	0.02%
Operational expenditure	2.98%	1.38%	0.00%	3.00%	1.38%	0.00%



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

During the period, the Sub-Fund had a proportion of sustainable investments with an environmental objective that was not aligned with the EU Taxonomy amounting to 13.30%.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



What was the share of socially sustainable investments?

During the period, the Sub-Fund had a proportion of socially sustainable investments amounting to 20.10%.



What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

During the reference period, the fund allocated assets across cash, government bonds, supranational bonds (when not classified as sustainable), other investments with unavailable data, and derivatives.

Cash holdings are used to manage liquidity and cash flows, while derivatives are employed to enhance portfolio management efficiency in line with the fund's investment strategy. Investments in residential bonds, government bonds, supranational bonds, and assets with unavailable data are structured to align with the fund's target asset allocation.

During this period, the fund did not apply any environmental or social minimum safeguards to these investments.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the reference period, the Sub-Fund promoted environmental and social characteristics within its Swedish equity portfolio through its holdings in the SEB Sweden Equity Fund. This was achieved by incorporating companies with strong sustainability profiles, as well as those positioned to benefit from regulations aimed at mitigating adverse environmental impacts. Notable investments include Atlas Copco and Alfa Laval, whose products and services support the transition from fossil fuels to more sustainable alternatives, thereby contributing to reduced greenhouse gas emissions.

Active ownership is integral to the investment process, enabling meaningful engagement with companies to guide them towards more sustainable practices and demand change when expectations are not met. Throughout the year, Management Company has exerted influence through participation in nomination committees, voting at shareholder meetings, and maintaining ongoing dialogues with management and boards. As one of the largest shareholders in several Swedish and Nordic companies, Management Company plays a significant role in shaping corporate strategies.

Key focus areas during the year included aligning executive compensation and incentive programmes with sustainability objectives and increasing transparency in climate-related reporting. For example, Management Company engaged with Beijer Ref on integrating sustainability-linked targets into the company's long-term compensation structures. Similarly, discussions with AstraZeneca focused on its sustainability initiatives and approach to emerging regulatory challenges in China.

The Sub-Fund excludes companies that do not meet Management Company's sustainability criteria, as determined through its screening process and investment restrictions. One of the Fund's exclusion criteria is the avoidance of companies involved in fossil fuel activities. As a result, the Sub-Fund has refrained from investing in companies such as International Petroleum Corp., which focuses on oil and gas extraction. Another excluded company is Evolution, which operates in the commercial gambling sector, generating more than 5% of its revenue from gambling-related activities.

For underlying funds managed by external fund managers, Management Company's sustainability policy is applied. While deviations may occur, these are closely monitored and may lead to divestment if necessary.

For more information about the Management Company's sustainability policy, exclusion criteria, and assessment methodology for sustainable investments, please visit: [Our sustainability approach at Asset Management | SEB](#)



How did this financial product perform compared to the reference benchmark?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The Sub-Fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How does the reference benchmark differ from a broad market index?**

The Sub-Fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

The Sub-Fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform compared with the reference benchmark?**

The Sub-Fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform compared with the broad market index?**

The Sub-Fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.