



Robur

Translation from Swedish

SWEDBANK ROBUR FONDER AB's PRINCIPLES FOR SHAREHOLDER ENGAGEMENT

Adopted on November 14, 2019 (replacing June 3, 2019)

Shareholder Engagement

Swedbank Robur

Swedbank Robur Fonder AB ("Swedbank Robur") is an asset manager and wholly owned subsidiary of the Swedbank Group.

Swedbank Robur is one of Sweden's largest asset managers and, accordingly, one of the largest shareholders in the regulated markets in Sweden. Exercising the ownership role responsibly is an important element of the management assignment from fund unit-holders.

Purpose of shareholder engagement

Swedbank Robur's principles for shareholder engagement have been adopted by the Board of Swedbank Robur, which also regularly reviews the principles.

These principles for shareholder engagement apply for all shares in Swedbank Robur's funds. The principles are based primarily on the basis of Swedish stock-market companies ("Company/Companies"), meaning Swedish limited liability companies that have issued shares for trading on a regulated market in Sweden. When Swedbank Robur exercises an active ownership role in other companies, for example companies listed on trading platforms or foreign companies these principles will be followed to the greatest extent possible.

Swedbank Robur's management assignment from fund unit-holders, within the framework created by legislation and regulations, is to invest the fund's assets with the aim of generating a favourable long-term return for the fund's unit-holders. In addition, with the goal of optimizing the value of the Companies' shares sustainably in the long term, Swedbank Robur shall actively and responsibly exercise the rights and obligations that accompany ownership in the Companies in which the funds have invested.

Furthermore, Swedbank Robur wants to actively encourage a high level of public confidence in share ownership and in the stock market and to contribute to ensuring that the regulated markets in Sweden continue to be attractive and efficient securities markets in the future. Swedbank Robur also wants to encourage Companies and other players in the stock market to observe the generally accepted securities market trading practices.

Decision-making and managing conflicts of interest

Swedbank Robur's Board of Directors shall to at least half consist of members, independent in relation to the Swedbank Group. Corporate governance matters of an essential and principle nature, as the adoption of the Principles for Shareholder Engagement and matters where a conflict of interest between Swedbank Robur and the Swedbank Group or other banks or financial institutions may occur, are decided by the Board of Directors. Swedbank Robur's Articles of Association require that at least a majority of the independent Board members support the decision. Swedbank Robur does not participate in the Nomination Committee of Swedbank AB or in

Companies that conduct operations similar to the Swedbank Group.

The Company has established a corporate governance council, with the purpose to be a council for information and experience exchange regarding nomination committees and general shareholders meetings, for members of nomination committees appointed by Swedbank Robur.

Ongoing corporate governance work is co-ordinated within the unit for corporate governance but members of management, asset management and the Board's independent members are also active in this work.

Regulations

Swedbank Robur's operations are primarily regulated by the Swedish Securities Funds Act (2004:46) and the Alternative Investment Fund Managers Act (2013:561). The Acts contain the basic rule for fund operations, namely, that in all operations relating to management of the funds the fund company shall act exclusively in the common interest of the fund unit-holders. For each of Swedbank Robur's funds, there are also fund regulations, approved by the Swedish Financial Supervisory Authority, stating, for example, how the fund's assets may be invested.

It also follows from the Swedish Securities Funds Act (2004:46) that a fund company may not exercise a significant influence on the management of the Company.

Other regulations that are of significance for Swedbank Robur's corporate governance include rules and guidelines issued by the Swedish Investment Fund Association, primarily the Swedish Code of Conduct for Fund Management Companies and the Guidelines for Investment Fund Managers engagement as shareholders. The guidelines take into account principles adopted by the European Fund and Asset Management Association (EFAMA).

In addition, recommendations concerning the responsibilities and role of shareholders are also contained in the Swedish Corporate Governance Code ("the Code").

Responsible investments and exercising shareholder engagement

Swedbank Robur believes that environmental and social issues and matters of business ethics and corporate governance affect fund returns, and that Swedbank Robur has a responsibility to act in these matters in the best long-term interests of the fund unit-holders. Swedbank Robur has signed the PRI (Principles for Responsible Investment), an open, global initiative for institutional investors launched in 2006 with the support of the UN and the ICGN (International Corporate Governance Network) Global Stewardship Principles from 2018.

The investment process strives to identify companies with products and services that contribute to a sustainable development, for instance in line with the UN 17 Sustainable Development Goals, focusing on mitigating climate risks.

Swedbank Robur engages with companies as a responsible owner and refrains from investing when necessary. In particular, assessment of companies is conducted in

industries and geographies with a significant sustainability risk and holdings may be divested if the company dialogue does not achieve the intended results. Swedbank Robur's Board of Directors has adopted a responsible investment policy, which can be found on our website and which further describes this.

Means for shareholder engagement

Shareholders, Board of Directors and management in the Companies have different roles in terms of their responsibilities, rights and obligations. It is important to maintain a proper balance between these functions.

Shareholder engagement is the shareholders' influence on and control of the Company's Board of Directors and management. Swedbank Robur's shareholder engagement shall primarily take place prior to and at General Meetings, through continuous dialogue with the Board and the company's management (taking into account insider legislation) and, if deemed suitable, through co-ordination with other shareholders.

Monitoring of portfolio holdings takes place, for example, through analysis and screening of financial and non-financial reporting, notice material to General Meetings, press releases, follow-up of media reporting and in an ongoing dialogue. Dialogue takes place regularly through various representatives of the fund company, for example portfolio managers in actively managed funds, sustainability analysts, corporate governance managers and nomination committee members appointed by the fund company. Dialogue with the Companies' representatives takes place partly in meetings initiated by the Companies and partly in meetings initiated by representatives of the fund company. The meetings can be in the form of regular updates or due to special events.

The General Meeting is the Company's highest executive body and, accordingly, it is important that Swedbank Robur participates at General Meetings and exercises the voting rights attached to the funds' shareholding. Swedbank Robur can make exceptions from this principle, if its participation and voting at General Meetings is considered of minor importance for the fund unit-holders, for example, in situations in which Swedbank Robur's shareholding is insignificant in relation to other shareholders' holding or the shareholding represents only a very small part of the investing fund's total portfolio value. The same principles are normally applied for companies listed on stock markets outside of Sweden. Swedbank Robur's ownership is mostly lower in such companies compared with Companies listed in Sweden.

Swedbank Robur normally participates at General Meetings in Sweden through its own representatives, while participation in foreign companies occurs via proxy voting. Swedbank Robur's guidelines for exercising voting rights in the case of proxy voting are described in [Appendix 1](#). Prior to voting in foreign companies, analysis services performed by voting advisors are used to ensure that the issues are also highlighted from an international and local perspective, but all decisions on voting are made by the fund company.

Swedbank Robur does not apply equity securities lending.

Board assignments are difficult to combine with the type of management operations that Swedbank Robur's conducts. Employees of Swedbank Robur shall therefore not generally be members of the Boards of Companies. If, however, it should in any case

be deemed advantageous for Swedbank Robur's fund unit-holders, the Board of Swedbank Robur may decide to make an exception to this principle.

Swedbank Robur considers participation in Nomination Committees to be highly important and generally participates in Nomination Committees, in companies that apply the Swedish Code for Corporate Governance, if qualifying as a major shareholder and is offered the opportunity to appoint a member to the Committee. Normally, it is important that Nomination Committee activities are conducted in such a manner that the freedom of action as regards to the shares contained in the funds is not restricted.

Co-operation with other shareholders

Swedbank Robur is not part of any fixed ownership group, but Swedbank Robur believes that co-operation with other shareholders on certain issues can improve the possibilities of active and effective shareholder engagement. It may, for example, apply to collaboration for sustainability dialogues with companies within a certain industry within the framework of PRI or in co-operation with other institutional owners regarding share-related incentive programs.

Fund capital's character affects shareholder engagement

The capital in each fund is owned collectively by the fund unit-holders, who can redeem their units on short notice. Accordingly, it is important for Swedbank Robur to secure substantial freedom of action for various investments. Situations may arise in which Swedbank Robur must choose between actively promoting a change in a Company or divesting shares in the Company. The deciding factor in each case shall be which alternative is assessed as best fulfilling the goal of a favourable return in the long term for the fund's unit-holders.

Communication

Swedbank Robur is of the opinion that it is of utmost importance that Swedbank Robur's views on ownership matters are communicated to the fund unit-holders and to the Companies and other stakeholders in the capital market. Swedbank Robur has publically published its ownership policy since 1996. It is available on our website, where positions on major ownership issues are also stated such as details of participation in Nomination Committees, General Meetings and public takeover bids.

On the website there is also information available regarding Swedbank Robur's sustainability work as well as the annual PRI report regarding how the principles are applied and followed.

Swedbank Robur's Corporate Governance principles

1 Swedish Corporate Governance Code

Swedbank Robur favorably views The Code, which was adopted on July 1, 2005, and considers that it has worked well for most Companies that have adopted it. The Code is largely a codification of the practice that has developed over the past few years as regards corporate governance. Reviews of the Code have been carried out and since 2008 it also includes smaller Companies and since 2018 it is a listing requirement on Nasdaq First North Premier to apply the Code.

It is difficult to create a corporate governance code that is appropriate for all Companies and situations. Individual company adaptations must be possible. The Code principle of "comply or explain" is therefore key.

Corporate governance must not merely be a question of formalities. However, clearly defined rules of play on the capital markets and a clear-cut allocation of roles among players create conditions that lead to a focus on the issues that are important for the Companies.

In addition to clarifying its own shareholder engagement, Swedbank Robur intends, as a complement to the Code, to also express its own understanding of proper corporate governance.

2 Equal treatment of shareholders

All shares in a Company that carry equal rights to the Company's assets and earnings should be treated equally and should have the same rights. Accordingly, the basic premise is that all shares in a Company that have the same rights should have the same number of votes. The Articles of Association should not stipulate any take-over defenses.

In public tender offers, all shares entailing equal rights to the Company's assets and earnings shall be treated equally.

3 General Meeting

The General Meeting is an opportunity for all shareholders to meet and direct questions to the Board, the company's management and the auditors. Conducting the General Meeting is largely the Board's responsibility. When planning a General Meeting, the Board should create the necessary conditions to ensure that the General Meeting is an informative occasion for the shareholders.

It is important that the Board ensures that all shareholders, in adequate time prior to a General Meeting, receive clear and relevant information and motivation regarding the proposals to be presented at the General Meeting. Complete documentation for decisions must be available to the shareholders in adequate time prior to the General Meeting on the Company's website, preferably already in conjunction with the publishing of the notice convening the General Meeting. The notice should be designed so that, as far as possible, shareholders who are not themselves present at

the meeting, such as foreign shareholders voting via a proxy who has been given instructions, are able to participate in voting on resolutions on equal terms with shareholders who are physically present at the meeting.

4 The Nomination Committee

The Nomination Committee is the General Meeting's body for preparing decisions regarding voting and fee issues concerning the Board and auditors, as well as procedural matters for the incoming Nomination Committee. The Nomination Committee shall look after the common interests of all the shareholders.

The Nomination Committee shall consist of the Company's largest shareholders, and the established principles for appointment of the Nomination Committee shall not leave any room for arbitrariness. In normal circumstances, only one member of the Board, often the Chair, shall be included in the Nomination Committee.

It is appropriate that the mandate for appointment of the Nomination Committee provides opportunity to change the composition of the Nomination Committee in the event of major ownership changes. It is also important to note that the Nomination Committee's task applies until the next Nomination Committee is appointed. No fees shall be paid to the Nomination Committee's members.

A well-organized nomination process ensures that the greatest possible effort will be devoted to appointing a strong Board. Careful evaluation of the Board is a key component of the work of the Nomination Committee. In addition to studying the Company's evaluation of the work of the Board, the members of the Nomination Committee should complement this by themselves interviewing and meeting Board members and the chairs of board committees.

The Nomination Committee shall also study the Audit Committee's annual assessment of audit work and consider the guidelines established for which services, aside from auditing, that the Company can purchase from the Company's auditors. The Audit Committee of the Company is responsible for the audit procurement process, which should be conducted in a transparent and open process with the Nomination Committee.

It is important that the Nomination Committee will be given the time it requires to fulfil its mandate. Accordingly, the Nomination Committee shall convene to plan its strategy as soon as possible after its members have been appointed. Normally, the Chair of the Board shall convene the first meeting of the Nomination Committee. The Nomination Committee shall document its activities.

The activities of the Nomination Committee shall be conducted in such a manner as to ensure that only in exceptional cases and only for brief periods will the members of the Nomination Committee become insiders.

5 Board of Directors

The Board is responsible for the Company's organisation and management of the Company's business. The Board members must protect the interests of the body of shareholders with utmost integrity and actively promote the long-term optimization of the share value.

The Board members should be shareholders in the Company.

It is important that the Board contain the competence, experience and background required in relation to the Company's complexity and operations. Efforts shall be made to achieve gender balance on the Board. To ensure that the Board can handle situations in which the interests of minority shareholders be regarded, such as in a public tender offer, the Board shall maintain a proper balance of independent and dependent members. To ensure the efficiency of the Board, it should not be too large.

Board members should not have too many other assignments, if they are to be able to discharge their Board assignment and thereby actively contribute to effective Board work.

6 Auditing and internal control

The auditor is appointed by the General Meeting and has the task of reviewing the management of the Company by the Board and the company management on behalf of the shareholders. Accordingly, it is of major importance that the auditor assumes an impartial position in relation to these bodies and that there is regular independent evaluation (quality review) of the auditing in a Company.

The auditor should in the audit report as well as on the General Meeting provide the shareholders with comprehensive information regarding the audit of the Company.

Proper internal control is a natural element of the operations of all well-managed Companies. It is the responsibility of the Board to ensure that the Company enjoys a favourable control environment. The Board must strive to ensure that the reporting relating to internal control provides an accurate picture of the main risks the Company faces and how it controls and follows up these risks.

7 Fees and remuneration to Board members

The General Meeting shall make decisions regarding all types of fees to Board members. Decisions on fees can in exceptional cases be made by a party other than the General Meeting, but in such cases the Chair of the Board must report on the decisions made and the reasons for the chosen form of decision at the next General Meeting.

Swedbank Robur recommends fixed Board fees as a main principle. In exceptional cases, a variable component may be accepted, if this can be specifically justified for the particular Company. The design of the variable portion of the fee must be clear and such that the controlling function of the Board is not side-lined or questioned. The total cost that may impact future income statements shall be reported and considered in the proposal along with the consequences of potential hedging actions.

8 Remuneration to senior executives

There must be a well-balanced remunerations policy with guidelines for various compensation components for the employees. The policy must be approved by the General Meeting as regards the part of it that refers to company management. The policy must also include conditions relating to termination of employment and pension terms. Pensions should be earned in proportion to length of employment in the position and such that the costs can be predicted by the Company, e.g. through premium-based pension provisions.

Even if the General Meeting approves the remuneration policy, it is up to the Board to ensure that the policy is well balanced and adapted to the Company's circumstances. In addition, it is the Board's responsibility to ensure that the contracts with management personnel are reasonable.

9 Share-related incentive programs

It is in the shareholders' interest that the efforts by the Company's employees to create shareholder value in the long term increase, and it is therefore beneficial to have well-conceived share-related incentive programs ("Incentive Programs") aimed at employees. Incentive programs shall be designed to promote long-term share ownership. This should be based on Incentive programs comprising a wider circle of employees in a Company and not solely the company management. The term "employees" refers to persons whose main employer is the Company or other Group company. Incentive programs based on shares in unlisted subsidiaries shall be avoided. Board members shall not participate in employee Incentive Programs.

The Board must take full responsibility for the design of Incentive Programs and not delegate this task to company management. The complexity of many Incentive Programs places substantial responsibility on the Board to explain and justify its design as well as any local adaptation. The Board should establish proposals for Incentive Programs to major shareholders in adequate time and shall allocate sufficient time in the establishment process to receive the views of the owners. Although an Incentive Program in accordance with legislation or generally accepted securities market trading practices does not require approval from a General Meeting, the program should nevertheless be decided by the General Meeting, to ensure full transparency and the shareholders' acceptance of the program.

Incentives programs must be reasonable and not provocative from a shareholder's perspective.

Allotment in Incentive Programs should normally be based on a clearly defined performance, either in the form of an individual financial investment or the achievement of a goal. Performance in the form of individual financial investments shall always entail a certain risk, meaning that total subsidy after-the-fact should not occur. The goals must be quantitative and transparent, and communicated to employees in advance. The requirements associated with the goals shall be reported openly to shareholders, as much as possible and to a reasonable extent prior to the decision or in the annual report afterwards. The goals should be established so as to require substantial performance to receive the expected and maximum allotment, not just an increase in the share price.

The shareholders in the Company shall receive extensive information about the Incentive Program's structure and development and about the consequences for the shareholders, such as dilution effects, effects on important key data and costs to the company, including potential hedging actions. Information shall be provided for both expected and maximum allotment. The Incentive Programs should have a limit or a clause protecting the Company against unreasonable allotment. Essential assumptions for calculations shall be provided. The Board should also present an evaluation of previous Incentive Programs and account for their contribution to the long-term value trend for shareholders. Information shall be presented prior to the General Meeting that will decide on the Incentive Program and continuously in the Company's Annual Report and on the Company's website.

10 Capital structure

Companies shall work actively to achieve an optimal capital structure and must have the financial resources needed to secure and develop the Company's business. Surplus liquidity shall be distributed to the shareholders. In decisions as to whether this is to be done through a dividend, redemption procedure or share repurchase, the Company's individual situation must be taken into account. The Companies must clarify their reasons for their chosen capital structure and dividend policy.

In the case of a share repurchase decision, the liquidity of the share, the effect on various share types with equal financial rights in the Company, and the impact of existing and resolved Incentive Programs must be given particular consideration.

New share issues shall primarily be conducted as cash issues with preferential rights for the Company's existing shareholders. Deviation from existing shareholders' preferential rights ("private placement") should only be authorized in special situations and the Board must provide detailed motivation of such a proposal to the General Meeting.

Authorizations for the Board can be motivated for certain types of situations when it could normally be assessed as less constructive to wait with a decision until a General Meeting is held, e.g. in the case of smaller corporate acquisitions. The assessment must be restrictive with high transparency regarding the purpose, including conditions by which the Board can exercise the authorization and should only be proposed as cash private placements in exceptional cases. Cash private placements must take place on market terms. Authorizations regarding share issues should be limited to a maximum of 10 percent of the outstanding shares.

The Board shall particularly consider and justify the total dilution that may result from a combination of authorizations regarding, for example, new share issues, share repurchases, and the transfer of treasury shares and Incentive Programs.

11 Sustainability

The Company's responsibility within the area of sustainability should be in line with the UN's Global Compact principles, which are based on international norms for human rights, working conditions, the environment and business ethics.

In order to be competitive in the long term, Companies must handle relevant risks and opportunities in the area of sustainability. Such risks and opportunities should be analyzed, evaluated and reported to the Board on an ongoing basis. Companies with significant risks in their operations, such as in the environmental affect or in their geographic presence, shall have a more developed work.

The Board shall assume a responsible approach and work actively on the sustainability issues relevant to the Company. These may include, for example, matters relating to the environment and climate impact, human rights, working conditions and diversity throughout the value chain (own operations, suppliers, business partners and products/services), as well as business ethics issues such as anticorruption and tax. The Company's position on relevant sustainability matters shall be recorded in a Code of Conduct and in policy documents adopted by the Board.

The Board shall ensure that the Code of Conduct and the policy documents are complied with in all parts of the corporate group through the establishment of governance and management systems. This comprises both internal operations and business partners such as suppliers in relevant cases. The Board shall evaluate the Company's performance on an ongoing basis.

The Board shall also ensure that the shareholders receive a true and fair picture of the Company's risks, position and active work in the area of sustainability. This should take place via external communications such as Annual Reports and the website, where the Code of Conduct and the policy documents should also be published.

12 Provision of information

It is of basic importance for a well-functioning stock market that the Companies' information to shareholders and other stakeholders in the equity market is good.

The information shall be correct, relevant, reliable and open. The information shall, in addition to providing a correct view of the Company's economic/financial situation, also describe the Company's sustainability work, and enable a well-founded assessment of its future development.

It is a minimum requirement that the Companies comply with the statutory demands, requirements under the Code as well as the stock market or marketplace's listing contract.

The Companies should especially strive to provide complete and correct information about transactions and other conditions that could result in a conflict of interests between the Company and anyone closely connected with the Company.

Links:

Swedish Investment Fund Association, fondbolagen.se/en/

EFAMA, efama.org

Swedish Corporate Governance Board, corporategovernanceboard.se

Global Compact, unglobalcompact.org

PRI, unpri.org

Appendix 1

Swedbank Robur's guidelines for the exercise of voting rights in Companies listed outside of Sweden

Guidelines

The following guidelines are items that Swedbank Robur considers significant when exercising ownership in companies and when exercising the voting rights at general meetings outside Sweden.

The guidelines are based on internationally accepted principles for good corporate governance, mainly the OECD Guidelines for multinational enterprises and the UN Global Compact. The guidelines relate to proposals from the board of directors as well as shareholders. Local codes and regulations, industry standards, listing agreements, and circumstances specific to each market can lead to divergence from the guidelines.

1. Equal treatment of shareholders

All shares in a company should carry the same rights. Accordingly, the basic premise is that all shares in a company should have the same number of votes. For companies with differentiated voting rights, it is important to safeguard the interests of minority shareholders. Swedbank Robur supports the abolition of restrictions on voting rights based on the size of the holding. No stipulations obstructing the purchase of shares should be found in the Articles of Association. In public tender offers, all shares entailing equal rights to the company's assets and profit shall be treated equally.

2. General Meeting

Shareholders shall have the right to propose their own items of business for the agenda of the general meeting. It is important that all shareholders receive clear and relevant information and motivation regarding the proposals to be presented at the general meeting in adequate time prior to a general meeting. Complete documentation for decisions must be available to the shareholders in adequate time prior to the general meeting on the company's website, preferably already in conjunction with the publishing of the notice convening the general meeting. When information provided is insufficient for a decision, Swedbank Robur may abstain from voting or vote against the proposal.

3. Board of Directors

There shall be a formal and transparent board nomination and election process. The majority of the directors elected by the general meeting are to be independent of the company and its executive management. At least two of the members of the board who are independent of the company and its executive management are also to be independent of the company's major shareholders. Members of the board committees shall be independent of the company and its executive management. The CEO and the Chair of the board shall not be the same person. Swedbank Robur will vote against a proposed Board of Director that will hold both of the aforementioned roles.

4. Take-over defenses

As a rule Swedbank Robur votes "against the implementation of" and "for the abolition of" take-over defenses. Take-over defenses include "poison pills", such as unlimited authorization for fundraising, boards elected for periods longer than one year, and "golden shares".

5. Fees and remuneration

The general meeting shall make decisions regarding all types of fees to board members. As a main principle Swedbank Robur recommends that board fees be fixed. In exceptional cases, a variable component may be accepted, if this can be specifically justified for the particular company. The design of the variable portion of the fee must be clear and such that the controlling function of the board is not sidelined or questioned. Non-executive Board members shall not participate in share-related incentive programs for employees.

There must be a well-balanced remuneration policy with guidelines for various compensation components for the senior executives. Variable remuneration, including share-related incentive programs, shall reward favorable long-term performance and the remuneration shall be less or none if performance is not delivered. Share-related incentive programs should be designed to create shareholder value in the long term and promote long-term share ownership.

When information provided about executive compensation and share-related incentive programs to employees is insufficient with regards to structure, evaluation and transparency, Swedbank Robur will abstain from voting or vote against the related proposal.

6. Capital structure

Companies must have the financial resources needed to secure and develop the company's business. Surplus liquidity must be distributed to shareholders. In decisions as to whether this is to be done through a dividend, redemption procedure or share repurchase, the company's individual situation must be taken into account. The companies must clarify their reasons for their chosen capital structure and dividend policy.

Authorization for share repurchases shall not exceed ten percent of the share capital. Cancellation or any other transfer of treasury shares shall be decided by a general meeting. Shareholders shall be entitled to vote on issues of new shares to ensure that their rights are safeguarded. New share issues shall primarily be conducted as cash issues with preferential rights for the company's existing shareholders. Deviation from existing shareholders' preferential rights (private issue) should only be authorized in special situations and the board must provide detailed motivation of such a proposal to the general meeting. Private cash issues shall take place on market terms.

Authorizations to issue new shares should not exceed ten percent of the company's share capital.

7. Sustainability

The Company's responsibility within the area of sustainability should be in line with the UN's Global Compact principles, which are based on international norms for human rights, working conditions, the environment and business ethics.

The Board shall ensure that the shareholders receive a true and fair picture of the Company's risks, position and active work in, for individual companies, relevant area of sustainability. Companies with significant risks in their operations, such as in the environmental affect or in their geographic presence, shall have a more developed work.

Swedbank Robur will support proposals for adopting a Code of Conduct and relevant policy documents if they do not already exist. Swedbank Robur will also support proposals for compulsory reporting relating to information on sustainability such as climate impact reporting, diversity reporting or political contributions if the reporting is not already done in a satisfactory manner.