



RI TRANSPARENCY REPORT 2017

Swedbank Robur

00 01	Mandatory	Gateway/Peering	General																																										
00 01.1 Select the services you offer.																																													
<input checked="" type="checkbox"/> Fund management																																													
% of assets under management (AUM) in ranges																																													
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%																																													
<input checked="" type="checkbox"/> Fund of funds, manager of managers, sub-advised products																																													
% of assets under management (AUM) in ranges																																													
<input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%																																													
<input type="checkbox"/> Other, specify <input type="checkbox"/> Execution and advisory services																																													
00 02	Mandatory	Peering	General																																										
00 02.1 Select the location of your organisation's headquarters.																																													
Sweden																																													
00 02.2 Indicate the number of countries in which you have offices (including your headquarters).																																													
<input type="radio"/> 1 <input checked="" type="radio"/> 2-5 <input type="radio"/> 6-10 <input type="radio"/> >10																																													
00 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).																																													
213																																													
00 03	Mandatory	Descriptive	General																																										
00 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.																																													
<input type="radio"/> Yes <input checked="" type="radio"/> No																																													
00 04	Mandatory	Gateway/Peering	General																																										
00 04.1 Indicate the year end date for your reporting year.																																													
31/12/2016																																													
00 04.2 Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.																																													
Total AUM 789,159,000,000SEK																																													
00 05	Mandatory to Report, Voluntary to Disclose	Gateway	General																																										
00 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes:																																													
<table border="1"> <thead> <tr> <th></th> <th>Internally managed (%)</th> <th>Externally managed (%)</th> </tr> </thead> <tbody> <tr> <td>Listed equity</td> <td>>50%</td> <td>0</td> </tr> <tr> <td>Fixed income</td> <td>10-50%</td> <td>0</td> </tr> <tr> <td>Private equity</td> <td>0</td> <td>0</td> </tr> <tr> <td>Property</td> <td>0</td> <td>0</td> </tr> <tr> <td>Infrastructure</td> <td>0</td> <td>0</td> </tr> <tr> <td>Commodities</td> <td>0</td> <td>0</td> </tr> <tr> <td>Hedge funds</td> <td>0</td> <td>0</td> </tr> <tr> <td>Forestry</td> <td>0</td> <td>0</td> </tr> <tr> <td>Farmland</td> <td>0</td> <td>0</td> </tr> <tr> <td>Inclusive finance</td> <td>0</td> <td>0</td> </tr> <tr> <td>Cash</td> <td>0</td> <td>0</td> </tr> <tr> <td>Other (1), specify</td> <td>0</td> <td>0</td> </tr> <tr> <td>Other (2), specify</td> <td>0</td> <td>0</td> </tr> </tbody> </table>					Internally managed (%)	Externally managed (%)	Listed equity	>50%	0	Fixed income	10-50%	0	Private equity	0	0	Property	0	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
	Internally managed (%)	Externally managed (%)																																											
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Farmland	0	0																																											
Inclusive finance	0	0																																											
Cash	0	0																																											
Other (1), specify	0	0																																											
Other (2), specify	0	0																																											
00 06	Mandatory	Descriptive	General																																										
00 06.1 How you would like to disclose your asset class mix.																																													
<input checked="" type="radio"/> as percentage breakdown <input type="radio"/> as broad ranges																																													
00 07	Mandatory to Report, Voluntary to Disclose	Gateway	General																																										
00 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.																																													
<table border="1"> <tbody> <tr> <td rowspan="5">Internally managed</td> <td>15</td> <td>SSA</td> </tr> <tr> <td>15</td> <td>Corporate (financial)</td> </tr> <tr> <td>20</td> <td>Corporate (non-financial)</td> </tr> <tr> <td>50</td> <td>Securitised</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>				Internally managed	15	SSA	15	Corporate (financial)	20	Corporate (non-financial)	50	Securitised																																	
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	20	Corporate (non-financial)																																											
	50	Securitised																																											
00 09	Mandatory to Report, Voluntary to Disclose	Peering	General																																										

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 type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50 %		
Total		100%	

OO 10	Mandatory	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	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)
- Fixed income - corporate (non-financial)
- Fixed income - securitised
- None of the above

OO 12	Mandatory	Gateway	General
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OO 12.1 Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.

Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input checked="" type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
Direct - Fixed Income	
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
Closing module	
<input checked="" type="checkbox"/>	Closing module

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.

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 checked="" type="checkbox"/> Asset class-specific RI guidelines	<input checked="" type="checkbox"/> Applicable policies cover all AUM
<input checked="" type="checkbox"/> Sector specific RI guidelines	<input type="checkbox"/> Applicable policies cover a majority of AUM
<input checked="" type="checkbox"/> Screening / exclusions policy	<input type="checkbox"/> Applicable policies cover a minority of AUM
<input checked="" type="checkbox"/> Engagement policy	
<input type="checkbox"/> (Proxy) voting policy	
<input type="checkbox"/> Other, specify (1)	
<input type="checkbox"/> Other, specify(2)	

SG 01.4 Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.

- 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

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]

The board of Swedbank Robur adopted a **Policy for Responsible Investment** in early 2015. The policy is being implemented into the legal registration of the funds continuously during 2015-2017. The policy clarifies Swedbank Robur's responsibilities and the focus areas of engagement/ownership work, integration in investment processes and when company exclusion is the option.

Our **Ownership policy** states the companies' 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.

Swedbank Robur believes that environmental and social issues and matters of business ethics and corporate governance can 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.

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
http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdf

Attachment (will be made public)

Formalised guidelines on environmental factors

Formalised guidelines on social factors

Formalised guidelines on corporate governance factors

Asset class-specific RI guidelines

Sector specific RI guidelines

URL/Attachment

URL

Attachment (will be made public)
 Files: [link](#), [link](#), [link](#), [link](#), [link](#), [link](#), [link](#), [link](#)

Screening / exclusions policy

URL/Attachment

URL

Attachment (will be made public)
 Files: [link](#), [link](#)

Engagement policy

URL/Attachment

URL

Attachment (will be made public)
 Files: [link](#), [link](#)

We do not publicly disclose our investment policy documents

SG 02.4 Additional information [Optional].

Our report "Responsible Investment 2016" (in Swedish) can be found via this link:
http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2271040.pdf

Our webpage describing our work as a Responsible Investor can be found via this link:
<http://www.swedbankrobur.se/om-swedbank-robur/ansvarsfulla-investeringar/index.htm>

SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

Swedbank Robur's Board of Directors consists of 6 members, 3 of which are independent in relation to the Swedbank Group. Essential governance matters are decided by the Board. Swedbank Robur's Articles of Association require that at least 2 of the independent Board members support the decision. The Swedish Securities Funds Act (SFS 2004:46) and the Alternative Investment Fund Managers Act (2013:561) regulates the fund operations; and contain the basic rule that fund companies in all operations relating to management of a fund shall act exclusively in the common interest of the fund unit-holders. It also follows from the Acts that an investment fund company may not exercise a significant influence on the management of the Company. There are also fund regulations, approved by the Swedish Financial Supervisory Authority, stating how the fund's assets may be invested. Swedbank Robur considers participation in Nomination Committees to be highly important and generally participates when a major shareholder but normally not in Swedbank AB or in companies with similar operations. It is important that Nomination Committee activities are conducted in such a manner that Swedbank Robur's freedom of action as regards the shares contained in its funds is not restricted.

No

SG 04	Voluntary	Descriptive	General
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SG 04.1 Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

- Yes
- No

SG 05	Mandatory	Gateway/Core Assessed	General
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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 06	Voluntary	Descriptive	General
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SG 06.1 List the main responsible investment objectives that your organisation set for the reporting year.

Responsible investment processes

Provide training on ESG incorporation

Key performance indicator
Part of staff undertaking sustainability training during the year.

Progress achieved
100 % of staff in Sweden. Only a part of the personnel in the newly established office in Lithuania.

Provide training on ESG engagement

Key performance indicator
Part of staff working with portfolio management and engagement undertaking sustainability training during the year.

Progress achieved
100 % of staff have received training. Also access to more sustainability analysis and engagement information.

Improved communication of ESG activities within the organisation

Key performance indicator
More in-depth information in reports, newsletters and internal 1-1-meetings, group meetings and meetings for all personnel.

Progress achieved
Achieved.

Improved engagement to encourage change with regards to management of ESG issues

Key performance indicator
Implementation of a more effective and resultoriented process for engagement with companies, Engagement 2.0.

Progress achieved
The new model and process implemented. More engagement activities. We contacted over 380 companies regarding sustainability issues during 2016.

Improved ESG incorporation into investment decision making processes

Key performance indicator
Decision on climate change for the funds

Progress achieved
Decision on exclusion of companies that produce coal (to more than 30 % of their turnover).

Other, specify (1)

Implementation of Swedbank Robur Policy on Responsible Investments in the fund prospectus of all funds.

Key performance indicator
Implementation of Swedbank Robur Policy on Responsible Investments in the fund prospectus of all funds.

Progress achieved
Achieved.

Other, specify (2)

other description (2)
Proxy voting outside of Swedish stock exchange

Key performance indicator
Proxy voting outside of Swedish stock exchange on the same level as the year before

Progress achieved
Achieved. Proxy voting on 124 general meetings outside of Sweden during 2016, compared to 129 during 2015, 108 during 2014 and 47 during 2013.

Other, specify (3)

ESG characteristics of investments

Over or underweight companies based on ESG characteristics

Improve ESG ratings of portfolio

Setting carbon reduction targets for portfolio

Key performance indicator
Measuring carbon foot print for our equity funds.

Progress achieved
External reporting on climate footprints for our equity and close-to-index funds twice during the year. Decision on exclusion of companies that produce coal (to more than 30 % of their turnover).

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Other activities	
<input checked="" type="checkbox"/>	Joining and/or participation in RI initiatives
	Key performance indicator
	Collaboration on company engagement
	Progress achieved
	Several PRI Clearinghouse groups. CDP on Energy Efficiency within European Utilities. Collaboration with Swedish investors.
<input checked="" type="checkbox"/>	Encouraging others to join a RI initiative
	Key performance indicator
	Fund-in fund asset managers should continue the evaluation of the sustainability status of fund providers.
	Progress achieved
	Achieved.
<input type="checkbox"/>	Documentation of best practice case studies
<input type="checkbox"/>	Using case studies to demonstrate engagement and ESG incorporation to clients
<input type="checkbox"/>	Other, specify (1)
<input type="checkbox"/>	Other, specify (2)
<input type="checkbox"/>	Other, specify (3)

SG 06.2 Additional information.

Taking part in developing work within the Swedish fund industry around better climate footprint fund reporting and better transparency on the sustainability considerations a specific fund takes, "Hållbarhetsprofile".

SG 07	Mandatory	Core Assessed	General
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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	
<input checked="" type="checkbox"/>	Board members or trustees
<input checked="" type="checkbox"/>	Oversight/accountability for responsible investment
<input type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input checked="" type="checkbox"/>	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
<input checked="" type="checkbox"/>	Oversight/accountability for responsible investment
<input checked="" type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input type="checkbox"/>	Other Chief-level staff or head of department, specify
<input checked="" type="checkbox"/>	Portfolio managers
<input type="checkbox"/>	Oversight/accountability for responsible investment
<input checked="" type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input checked="" type="checkbox"/>	Investment analysts
<input type="checkbox"/>	Oversight/accountability for responsible investment
<input checked="" type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input checked="" type="checkbox"/>	Dedicated responsible investment staff
<input checked="" type="checkbox"/>	Oversight/accountability for responsible investment
<input checked="" type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input type="checkbox"/>	External managers or service providers
<input type="checkbox"/>	Investor relations
<input checked="" type="checkbox"/>	Other role, specify (1)
	Independent board members
	Other description (1)
<input type="checkbox"/>	Oversight/accountability for responsible investment
<input checked="" type="checkbox"/>	Implementation of responsible investment
<input type="checkbox"/>	No oversight/accountability or implementation responsibility for responsible investment
<input type="checkbox"/>	Other role, specify (2)

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

7

SG 07.4 Additional information. [Optional]

An additional 7 are involved part time. That is appointed members in nomination committees (CEO, independent board members and other external people).

SG 08	Voluntary	Additional Assessed	General
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SG 08.1 Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.

<input checked="" type="checkbox"/>	Responsible investment included in personal development and/or training plan
<input type="checkbox"/>	None of the above
<input type="checkbox"/>	Responsible investment KPIs and/or goals included in objectives
<input type="checkbox"/>	Responsible investment included in appraisal process
<input type="checkbox"/>	Variable pay linked to responsible investment performance
<input checked="" type="checkbox"/>	Responsible investment included in personal development and/or training plan
<input type="checkbox"/>	None of the above
<input type="checkbox"/>	Responsible investment KPIs and/or goals included in objectives
<input type="checkbox"/>	Responsible investment included in appraisal process
<input type="checkbox"/>	Variable pay linked to responsible investment performance
<input checked="" type="checkbox"/>	Responsible investment included in personal development and/or training plan
<input type="checkbox"/>	None of the above
<input type="checkbox"/>	Responsible investment KPIs and/or goals included in objectives
<input type="checkbox"/>	Responsible investment included in appraisal process

- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above
- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above
- Independent board members
- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

SG 08.3 Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.
 During 2016 we have increased the linkage of KPIs and goals linked to RI.

SG 09	Mandatory	Core Assessed	PRI 4,5
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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.

Principles for Responsible Investment

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

Moderate

- 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)

Moderate

- CDP Forests
- 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)
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- 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

- 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 Swesif

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

Advanced

- 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

- United Nations Global Compact

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

Basic

- Other collaborative organisation/initiative, specify Institutionella Agares Förening (IAF), an association of Swedish institutional owners for regulatory matters on the stock market.

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

Advanced

- Other collaborative organisation/initiative, specify The Swedish Corporate Governance Board

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

Advanced

- Other collaborative organisation/initiative, specify Sustainable Value Creation

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

Advanced

- Other collaborative organisation/initiative, specify

Your organisation's role in the initiative during the reporting year (see definitions)			
Advanced			
SG 10	Mandatory	Core Assessed	PRI 4
SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
SG 10.2 Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.			
<input type="checkbox"/> Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations <input type="checkbox"/> Provided financial support for academic or industry research on responsible investment <input checked="" type="checkbox"/> Encouraged better transparency and disclosure of responsible investment practices across the investment industry <input checked="" type="checkbox"/> Spoke publicly at events and conferences to promote responsible investment <input checked="" type="checkbox"/> Wrote and published in-house research papers on responsible investment <input checked="" type="checkbox"/> Encouraged the adoption of the PRI <input type="checkbox"/> Wrote articles on responsible investment in the media. <input type="checkbox"/> Other, specify <input type="checkbox"/> No			
SG 11	Voluntary	Additional Assessed	PRI 4,5,6
SG 11.1 Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, individually <input checked="" type="checkbox"/> Yes, in collaboration with others			
SG 11.2 Select the methods you have used.			
<input type="checkbox"/> Endorsed written submissions to governments, regulators or public policy-makers developed by others <input type="checkbox"/> Drafted your own written submissions to governments, regulators or public-policy markers <input type="checkbox"/> Participated in face-to-face meetings with government members or officials to discuss policy <input checked="" type="checkbox"/> Other, specify <input type="text" value="specify description"/> See 11.4			
SG 11.3 Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.			
<input checked="" type="checkbox"/> Yes, publicly available http://www.regeringen.se/49948e/contentassets/7840678fa9fe4348b41d6aac1f323ca0/revisorns-skadestandsansvar-sou-201634 http://www.regeringen.se/4a58e0/contentassets/d5335167a2ee4e17b4dd025c3a78b784/jamn-konsfordelning-i-bolagsstyrelser-ds-201632 <input type="checkbox"/> No <input type="checkbox"/> No			
SG 11.4 Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.			
We have been involved together with the Swedish Investment Fund Association and Swedish Institutional Investors Association regarding The Auditor's Liability in the drafting of consultative response (Revisorns Skadestandsansvar, SOU 2016:34) and with Swedish Institutional Investors Association regarding Equal Gender Distribution in Company Boards (Jämn könsfördelning i bolagsstyrelser, Ds 2016:32).			
SG 12	Mandatory	Descriptive	PRI 1
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.			
<input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future environmental trends <input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future social trends <input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future governance trends <input type="checkbox"/> We execute other scenario analysis, specify <input checked="" type="checkbox"/> 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.			
<input type="checkbox"/> We do the following <input checked="" type="checkbox"/> We do not consider ESG issues in strategic asset allocation			
SG 13	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
SG 13.1 Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.			
<input type="checkbox"/> Changing demographics <input checked="" type="checkbox"/> Climate change			
SG 13.2 Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity			
<input type="checkbox"/> Established a climate change sensitive or climate change integrated asset allocation strategy <input type="checkbox"/> Targeted low carbon or climate resilient investments <input checked="" type="checkbox"/> Reduced portfolio exposure to emissions intensive or fossil fuel holdings <input type="checkbox"/> Used emissions data or analysis to inform investment decision making <input checked="" type="checkbox"/> Sought climate change integration by companies <input type="checkbox"/> Sought climate supportive policy from governments <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
SG 13.3 Indicate which of the following tools you use to manage emissions risks and opportunities			
<input checked="" type="checkbox"/> Carbon footprinting <input type="checkbox"/> Scenario testing <input checked="" type="checkbox"/> Disclosure on emissions risk to clients/trustees/management/beneficiaries			
SG 13.4 If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.			
We have signed the Montreal Carbon Pledge and publically disclosed the carbon footprint of 50 equity funds twice during 2016.			
<input type="checkbox"/> Target setting for emissions risk reduction <input checked="" type="checkbox"/> Encourage internal and/or external portfolio managers to monitor emissions risk <input type="checkbox"/> Emissions risk monitoring and reporting are formalised into contracts when appointing managers <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above <input type="checkbox"/> Resource scarcity			

- Technology developments
- Other, specify(1)
- Other, specify(2)
- None of the above

SG 14	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 14.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
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- Yes
- No

SG 17	Voluntary	Descriptive	General
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SG 17.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
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- Yes

SG 17.2	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.
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Swedbank Robur has had collaboration with Save the Children Sweden for over six years to encourage Swedish-listed companies to improve their work on taking responsibility for children's rights in their value chain. The collaboration started when we developed our Position Paper on children's rights. Earlier we conducted a questionnaire answered by 100 companies on children's rights and held one seminar before and one after the launch of the result of the study. This year we have focused on knowledge sharing and planning work shops for companies for the coming year.

- No

SG 17.3	Additional information.
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During 2016 the fee for the clients of our charity fund Swedbank Humanfond was removed. Swedbank Humanfond is a sustainability fund and 2 % of the fund is donated annually to approximately 70 charitable organisations of the client's choice. Over 1 billion SEK has been donated since the start of the fund.

LEI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
LEI 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.		
5	Passive		
0			
95	Active - quantitative (quant)		
	Active - fundamental and active - other		
LEI 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
LEI 02.1	For strategies that account for less than 10% of your internally managed listed equities, indicate if you would still like to report your activities.		
	Passive strategies		
	<input type="radio"/> Yes		
	<input checked="" type="radio"/> No		
LEI 03	Mandatory	Gateway	PRI 1
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%)		
	<input type="checkbox"/> Screening alone (i.e. not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e. not combined with any other strategies) <input type="checkbox"/> Integration alone (i.e. not combined with any other strategies) <input checked="" type="checkbox"/> Screening and Integration strategies <input type="checkbox"/> Thematic and integration strategies <input type="checkbox"/> Screening and thematic strategies <input type="checkbox"/> All three strategies combined <input type="checkbox"/> We do not apply incorporation strategies		
	Percentage of active listed equity to which the strategy is applied	100%	
LEI 03.2	Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.		
	<p>Today screening is used to exclude some sensitive products (cluster munition, anti-personal mines, chemical and biological weapons, nuclear weapons and companies producing coal to over 30 % of its turnover). Integration is used to enhance the investment process where sustainability risks can be considered to influence financial performance.</p> <p>Our internal ESG-department constitutes our core ESG-competence and internal experts on ESG-issues. We have two experienced governance-specialists. Our four sustainability (ES) analysts conducts sustainability analyses and are supported by our five external analysis firms - MSCI ESG Research, Sustainalytics, ISS-Ethix, GES Investment Services and Trucost. This information is both used for the filter function and engagement process for our large sustainability funds/mandates and for all actively managed funds. We focus on the high risk sectors and high risk regions. The ESG-department and the portfolio managers and financial analysts collaborate. The portfolio managers have access to sustainability ratings through internal systems and are given at least bi-annual fund specific briefings by the sustainability analysts. Our Department of Investor Risk Control check for limit breaches for every fund daily. ESG-information from financial brokers are used as ad-hoc extra information but is not incorporated into analysis or investment processes. The portfolio managers are also involved in general meeting issues both in preparatory work and as representatives when we attend the meetings in Sweden.</p> <p>During the year ESG-issues were integrated more in-depth with fundamental investment analysis prior to investments being made. The aim was to identify risks in order to find companies that were doing good work. Fund managers have several tools at their disposal in their integration work. Sustainability specialists work together with managers, and enhanced reconciliation work takes place continuously with portfolio managers regarding sustainability risks and sustainability work at the companies in each fund and its benchmark index. The manager also receives information about what it is that impacts on the fund's carbon footprint, the degree of sustainability work at the companies the fund has invested in, which companies that have the best and worst development in terms of their sustainability work within each industry, and which companies that have been involved in serious incidents. A decision is made as to whether we should contact the company to influence them regarding sustainability issues.</p> <p>For more than ten years we have evaluated our financial counterparties' sustainability analyses and provided feedback to encourage them to include sustainability in the analyses.</p>		
LEI 04	Voluntary	Additional Assessed	PRI 1
LEI 04.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.		
	<input type="checkbox"/> Raw ESG company data <input checked="" type="checkbox"/> Company-related analysis or ratings <input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager <input checked="" type="checkbox"/> Sector-related analysis or ratings <input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager <input type="checkbox"/> Country-related analysis or ratings <input checked="" type="checkbox"/> Screened stock list <input type="checkbox"/> ESG research provider <input type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager <input checked="" type="checkbox"/> ESG issue-specific analysis or ratings <input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input checked="" type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager <input type="checkbox"/> Other, specify		
LEI 04.2	Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.		
	Our internal sustainability analysts and MSCI ESG Research provide proactive sustainability analysis. We have also during the later parts of 2016 started to in part use analysis from Sustainalytics. GES Investment Services provides norm based screening. ISS-Ethix provides norm based screening and sensitive products screening. Trucost provides climate data.		
LEI 04.3	Indicate if you incentivise brokers to provide ESG research.		
	<input checked="" type="checkbox"/> Yes		
LEI 04.4	Describe how you incentivise brokers.		
	Now we are in the process of changing our process for this. Our broker evaluation process include a quantitative ESG component since 2009. It has for the most part been conducted twice a year. Before 2009 we gave qualitative feedback on the broker's services in the sustainability field twice a year.		
	<input type="radio"/> No		
LEI 05	Voluntary	Additional Assessed	PRI 1
LEI 05.1	Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.		

- Engagement
 - We have a systematic process to ensure the information is made available.
 - We occasionally make this information available.
 - We do not make this information available.
- (Proxy) voting
 - We have a systematic process to ensure the information is made available.
 - We occasionally make this information available.
 - We do not make this information available.

LEI 06	Mandatory	Descriptive	PRI 1
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LEI 06.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.
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- Negative/exclusionary screening
 - Product
 - Activity
 - Sector
 - Country/geographic region
 - Environmental and social practices and performance
 - Corporate governance

Description

At the end of 2016 we had decided on exclusion for 97 companies, the names of which can be found on our List of Excluded companies published on our website. It is companies that produce cluster munitions, anti-personnel land mines, chemical and biological weapons, nuclear weapons and companies that produce coal to over 30 % of its turnover. (In March 2017 we also excluded 7 companies linked to the Dakota Access Pipeline project.)

We have a process where we identify worst-of-the-worst companies in high risk sectors with low sustainability performance and those that are linked to violations of international norms. Those companies are on our Watch List (approximately 100 companies) and are candidates for our List of Excluded companies. As our portfolio managers have access to a system with sustainability ratings and information on the companies on our Watch List they have the possibility to take sustainability considerations related to the Watch List into account.

- Positive/best-in-class screening
 - Product
 - Activity
 - Sector
 - Country/geographic region
 - Environmental and social practices and performance
 - Corporate governance

Description

Positive best-in-class-screening is only used for our range of sustainability funds. The sustainability analysis however is also available to the portfolio managers and should be formally integrated starting 7 January 2017.

- Norms-based screening
 - 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

We have a process where we identify worst-of-the-worst companies in high risk sectors with low sustainability performance and those that are linked to violations of international norms. Those companies are on our Watch List and are candidates for our List of Excluded companies. Currently we primarily focus on engagement with Watch List-companies. As our portfolio managers have access to a system with sustainability ratings and information on the companies on our Watch List they have the possibility to take sustainability considerations into account.

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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During 2015 our Board adopted a Policy on Responsible Investment including negative exclusion criteria, integration and engagement. The policy has been revised both during 2016 and 2017. We inform our clients/beneficiaries on our website and in our newsletter quarterly.

LEI 07	Mandatory	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
- Companies on the Swedish stock exchange (on which we conduct sustainability analysis ourselves) have the opportunity to review our ESG research on them.
- None of the above

LEI 08	Voluntary	Additional Assessed	PRI 1
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LEI 08.1	Indicate which processes your organisation uses to ensure fund criteria are not breached
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- Systematic checks are performed to ensure that stocks meet the funds' screening criteria.
- Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.
- Audits of fund holdings are undertaken regularly by internal audit function
- Other, specify
- None of the above

LEI 08.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
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Limit reports are produced every day by Investor Risk Control. Portfolio Managers have to make corrections as soon as possible.

Pre-trade-limits are under implementation. Currently approximately 75 % of equity portfolios.

LEI 10	Mandatory	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.
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ESG issues	Coverage/extent of review on these issues
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Environmental	Environmental
	<input checked="" type="checkbox"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input type="checkbox"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="checkbox"/> We do not review environmental issues
Social	Social
	<input checked="" type="checkbox"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="checkbox"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="checkbox"/> We do not review social issues
Corporate Governance	Corporate Governance
	<input checked="" type="checkbox"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="checkbox"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="checkbox"/> We do not review corporate governance issues

LEI 11	Voluntary	Additional Assessed	PRI 1
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LEI 11.1 Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.

- 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
- Company information and/or ratings on ESG are updated regularly
- A periodic review of the quality of the research undertaken or provided is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Other, specify
- Companies on the Swedish stock exchange (on which we conduct sustainability analysis ourselves) have the opportunity to review our ESG research on them.
- None of the above

LEI 11.2 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

LEI 12	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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LEI 12.1 Indicate which aspects of investment analysis you integrate ESG information into.

- Economic analysis
- Industry analysis
- Systematically
- Occasionally
- Quality of management
- Systematically
- Occasionally
- Analysis of company strategy
- Systematically
- Occasionally
- Portfolio construction
- Fair value/fundamental analysis
- Other, specify

LEI 14	Voluntary	Descriptive	PRI 1
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LEI 14.1 Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.

- Screening
 - Describe any reduction in your starting investment universe or other effects.
 - At the end of 2016 we had decided on exclusion for 97 companies, the names of which can be found on our List of Excluded companies published on ur website. It is companies that produce cluster munitions, anti-personnel land mines, chemical and biological weapons, nuclear weapons and companies that produce coal to over 30 % of its turnover. (In March 2017 we also excluded 7 companies linked to the Dakota Access Pipeline project.)
 - Specify the percentage reduction (+/- 5%)
 - %
- Integration of ESG issues
 - Select which of these effects followed your ESG integration:
 - Reduce or prioritise the investment universe
 - Overweight/underweight at sector level
 - Overweight/underweight at stock level
 - Buy/sell decisions
 - Other, specify
 - None of the above

LEI 17	Mandatory	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
- <http://www.swedbankrobur.com/about-swedbank-robur/corporate-governance/http://www.swedbankrobur.com/about-swedbank-robur/sustainability/>

LEI 17.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

LEI 17.3 Indicate the information your organisation proactively discloses to clients/ beneficiaries and 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.

- 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

LEI 17.7

Additional information. [Optional]

We have information on our website with more in-depth and updated information on the Swedish version on the website. Link to Swedish website: <http://www.swedbankrobur.se/om-swedbank-robur/ansvarsfulla-investeringar-hallbarhetsfonder/index.htm>

We also publish quarterly newsletters on our ESG-activities (<http://www.swedbankrobur.se/om-swedbank-robur/ansvarsfulla-investeringar-hallbarhetsfonder/nyhetsbrevet-ansvar-paverkan/index.htm>) and a yearly report, for "Responsible Investor 2016" see: http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2271040.pdf

LEA 01	Mandatory	Core Assessed	PRI 2
LEA 01.1 Indicate whether your organisation has a formal engagement policy.			
<input checked="" type="checkbox"/> Yes			
LEA 01.2 Indicate what your engagement policy covers:			
<input checked="" type="checkbox"/> Conflicts of interest <input checked="" type="checkbox"/> Prioritisation of engagements <input checked="" type="checkbox"/> Transparency <input checked="" type="checkbox"/> Environmental factors <input checked="" type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Engagements following on from decisions <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
LEA 01.3 Attach or provide a URL to your engagement policy. [Optional]			
http://www.swedbankrobur.com/idc/groups/public/@i/@sbg/@sb/@robur/documents/publication/cid_283114.pdfFiles.link.link			
LEA 01.4 Provide a brief overview of your organization's approach to engagement			
<p>Engagement with companies is the most important part of Swedbank Robur's work as a responsible investor and owner. Since 1996 we have an official ownership policy. We are actively involved to improve the long-term development of the companies in which we have shareholdings regarding ESG issues. We mainly exert our influence as owners in advance of and in connection to general meetings and we participate in nomination committees in Swedish companies where our funds are a major owner. We also maintain an ongoing dialogue with corporate boards and managements regarding ESG issues. Most of the engagement we conduct ourselves but sometimes with other major owners and we also take part in collaborative initiatives (i.e. within PRI Clearinghouse or the CDP) or have engagement made by our service providers.</p> <input type="checkbox"/> No			

LEA 02	Mandatory	Gateway	PRI 1,2,3								
LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.											
<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Reason for interaction</th> </tr> </thead> <tbody> <tr> <td>Individual/Internal staff engagements</td> <td> <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 </td> </tr> <tr> <td>Collaborative engagements</td> <td> <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 </td> </tr> <tr> <td>Service provider engagements</td> <td> <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 service providers </td> </tr> </tbody> </table>				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 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 service providers
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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 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 service providers										
LEA 02.2 Additional information. [Optional]											
<p>During 2016, of the companies that we engaged with on sustainability issues (ES):</p> <p>42 % we contacted ourselves</p> <p>36 % was through collaborative engagements</p> <p>22 % was through our service providers.</p>											

LEA 03	Mandatory	Core Assessed	PRI 2
LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.			
<input checked="" type="checkbox"/> Yes			
LEA 03.2 Describe the criteria used to identify and prioritise engagement activities carried out by internal staff.			
<input checked="" type="checkbox"/> Geography/market of the companies targeted <input checked="" type="checkbox"/> Materiality of ESG factors <input type="checkbox"/> Systemic risks to global portfolios <input checked="" type="checkbox"/> Exposure (holdings) <input checked="" type="checkbox"/> In reaction to ESG impacts which has already taken place <input checked="" type="checkbox"/> As a response to divestment pressure <input checked="" type="checkbox"/> As a follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Other, describe <input type="checkbox"/> No			
LEA 03.3 Additional information. [Optional]			
<p>If we are among the largest shareholders we participate in nomination committees and file joint resolutions in Sweden. The engagement and participation in nomination committees includes strategic discussions with Chair and CEO, evaluation of present board, review of board evaluations, interviews with present board members, identifying profiles of new candidates, interviews with potential candidates and evaluation of auditors in cooperation with the audit committee in order to prepare and file the resolutions.</p> <p>Sustainability engagements we identify and prioritise depending on:</p> <ul style="list-style-type: none"> - Companies in high risk sectors and on high risk markets with moderate or poor sustainability performance. - Companies linked to violations of international norms. - Our means of influence (e.g. ownership) 			

LEA 04	Mandatory	Core Assessed	PRI 2
LEA 04.1 Indicate if you define specific objectives for your engagement activities.			
<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes, for all engagement activities <input type="checkbox"/> Yes, for the majority of engagement activities <input type="checkbox"/> Yes, for a minority of engagement activities <input type="checkbox"/> 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.			
<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.
<input type="radio"/> Yes <input checked="" type="radio"/> No	

LEA 04.5	Additional information. [Optional]
A plan for engagement is set each year. It is updated and evaluated quarterly.	

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements
<input checked="" type="radio"/> Yes	

LEA 05.2	Describe the criteria used to identify and prioritise collaborative engagements
<input checked="" type="checkbox"/> Potential to learn from other investors <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography / market of the companies targeted <input checked="" type="checkbox"/> Materiality of ESG factors <input type="checkbox"/> Systemic risks to global portfolios <input checked="" type="checkbox"/> Exposure (holdings) <input checked="" type="checkbox"/> In response to ESG impacts which has already taken place <input checked="" type="checkbox"/> In response to divestment pressure <input type="checkbox"/> Client requests <input type="checkbox"/> Other, describe <input type="radio"/> No	

LEA 05.3	Additional information [Optional]
During 2016, of the companies that we engaged with on sustainability issues (ES), 36 % was through collaborative engagements.	

LEA 06	Mandatory	Core Assessed	PRI 2
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LEA 06.1	Indicate if you define specific objectives for your engagement activities carried out collaboratively.
<input checked="" type="radio"/> Yes <input checked="" type="radio"/> Yes, for all engagement activities <input type="radio"/> Yes, for the majority of engagement activities <input type="radio"/> Yes, for a minority of engagement activities <input type="radio"/> 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.
<input checked="" type="radio"/> Yes <input checked="" type="radio"/> Yes, in all cases <input type="radio"/> Yes, in the majority of cases <input type="radio"/> Yes, in the minority of cases <input type="radio"/> 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.
<input type="radio"/> Yes <input checked="" type="radio"/> No	

LEA 06.5	Additional information. [Optional]
In most cases we take part in collaborative engagements on specific themes, i.e. palm oil, fracking, human rights in extractives or transparency on climate data. PRI Clearinghouse is one important platform for our collaborative engagements. During the year we also took part in collaborative engagements with CDP. Sometimes we join collaborative engagements through Ethix SRI Advisors. We sometimes also engage on Swedish companies together with other Swedish institutional investors. If we are among the largest shareholders we participate in nomination committees and file joint resolutions in Sweden.	

LEA 07	Mandatory	Core Assessed	PRI 2,4
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LEA 07.1	Indicate if you play a role in the engagement process that your service provider conducts on your behalf.
<input checked="" type="radio"/> Yes	

LEA 07.2	Indicate the role(s) you play in engagements that your service provider conducts on your behalf.
<input type="checkbox"/> Discuss the topic (or ESG issue(s)) of engagement <input checked="" type="checkbox"/> Discuss the rationale for engagement <input type="checkbox"/> Discuss the objectives of the engagement <input checked="" type="checkbox"/> Select the companies to be engaged with <input type="checkbox"/> Discuss the frequency/intensity of interactions with companies <input checked="" type="checkbox"/> Discuss progress towards the engagement objectives <input checked="" type="checkbox"/> Monitor and review outcomes that have been achieved from the engagement <input type="checkbox"/> Discuss next steps for engagement activity <input checked="" type="checkbox"/> Participate directly in certain engagements with your service provider <input type="checkbox"/> Ad hoc monitoring and review of engagement processes. <input type="checkbox"/> Other, specify <input type="radio"/> No	

LEA 07.3	Additional information. [Optional]
During 2016, of the companies that we engaged with on sustainability issues (ES) 22 % was through our service providers.	

LEA 08	Mandatory	Core Assessed	PRI 2,6
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LEA 08.1	Indicate whether you monitor and/or discuss the following information provided to you by your service provider
<input checked="" type="checkbox"/> The subject (or ESG issue(s)) of engagement <input checked="" type="checkbox"/> The objectives of the engagement <input checked="" type="checkbox"/> The rationale for engagement <input checked="" type="checkbox"/> The frequency/intensity of interactions with companies <input checked="" type="checkbox"/> Progress towards achieving engagement goals	

- Outcomes that have been achieved from the engagement
- Next steps for engagement activity
- Other, specify
- None of the above

LEA 09	Voluntary	Additional Assessed	PRI 1,2
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LEA 09.1 Indicate if insights gained from your engagements are shared with your internal or external investment managers.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Service provider engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No

LEA 09.2 Additional information. [Optional]

Through at least bi-annual tailor made meetings and also through information in ESG-databases that the portfolio managers have access to. During 2016 we measured the carbon footprint of all equity-funds and close-to-index-funds twice. We also distributed montly reports on the sustainability scores and rankings of the funds according to Morningstar.

LEA 10	Mandatory	Gateway	PRI 2
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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="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track and cannot estimate our engagements
Service provider engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track and cannot estimate our engagements

LEA 11	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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LEA 11.1 Indicate the amount of your listed equities portfolio with which your organisation engaged during the reporting year.

	Number of companies engaged <small>(avoid double counting, see explanatory notes)</small>	Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated
Individual / Internal staff engagements	208	25Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated <input type="checkbox"/> of the total number of companies you hold <input checked="" type="checkbox"/> of the total value of your listed equity holdings
Collaborative engagements	139	0Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated <input type="checkbox"/> of the total number of companies you hold <input checked="" type="checkbox"/> of the total value of your listed equity holdings
Service provider engagements	85	0Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated <input type="checkbox"/> of the total number of companies you hold <input checked="" type="checkbox"/> of the total value of your listed equity holdings

LEA 11.2 Indicate the proportion of engagements that involved multiple, substantive and detailed discussions or interactions with a company during the reporting year relating to ESG issue.

Type of engagement	% Comprehensive engagements
Individual / Internal staff engagements	<input checked="" type="checkbox"/> > 50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> None
Collaborative engagements	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> None
Service provider engagements	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> None

LEA 11.3 Indicate the percentage of your collaborative engagements for which you were a leading organisation during the reporting year.

Type of engagement	% Leading role
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Collaborative engagements	<input type="radio"/> >50%
	<input type="radio"/> 10-50%
	<input checked="" type="radio"/> <10%
	<input type="radio"/> None

LEA 11.4 Indicate the percentage of your service provider engagements that you were highly involved in during the reporting year.

Type of engagement	% High involvement
Service provider engagements	<input type="radio"/> >50%
	<input type="radio"/> 10-50%
	<input checked="" type="radio"/> <10%
	<input type="radio"/> None

LEA 12 Voluntary Additional Assessed PRI 2

LEA 12.1 Indicate which of the following your engagement involved.

- Letters to outline the engagement and the objectives
 - In some cases
 - In majority cases
 - In all cases
- Meetings and/or calls with the appropriate team
 - In some cases
 - In majority cases
 - In all cases
- Visits to operations
 - In some cases
 - In majority cases
 - In all cases
- Roadshows
- ESG research
 - In some cases
 - In majority cases
 - In all cases
- Other, specify

LEA 13 Voluntary Additional Assessed PRI 2

LEA 13.1 Indicate if your engagements in the reporting year covered E, S and/or G issues, providing an estimation of the breakdown.

Individual / Internal staff engagements	
0	% Environmental only
0	% Social only
23	% Corporate Governance only
77	% Overlapping ESG issues
Collaborative engagements	
75	% Environmental only
10	% Social only
0	% Corporate Governance only
15	% Overlapping ESG issues
Service provider engagements	
31	% Environmental only
48	% Social only
0	% Corporate Governance only
21	% Overlapping ESG issues

LEA 14 Voluntary Descriptive PRI 2

LEA 14.1 Indicate whether you track the number of cases during the reporting year where a company changed its practices, or made a formal commitment to do so, following your organisation's and/or your service provider's engagement activities.

Yes

LEA 14.2 Indicate the number of companies that changed or committed to change in the reporting year following your organisation's and/or your service provider's engagement activities.

	Number of company changes or commitments to change
Individual / Internal staff engagements	
Collaborative engagements	
Service provider engagements	

No

LEA 15 Voluntary Descriptive PRI 2

Add Example 1

Topic or ESG issue	Governance (G)
Conducted by	Individual / Internal
Objectives	Increased gender balance in company boards
Scope and Process	Through participation in 69 nomination committees
Outcomes	Approximately 50 % of newly elected board members were women. Newly elected members were 16 % of total elected board members. The percentage woman on these boards increased from 33 % to 36% excluding the CEO (if a board member) and from 35 % to 38% if the CEO was included (if a board member)

Add Example 2

Topic or ESG issue	Sustainability analysis (ES)
Conducted by	Individual / Internal
Objectives	Sustainability analysis of companies on the Swedish stock exchange
Scope and Process	We have during 2016 done in-depth sustainability analysis with special focus given to companies within e.g. the Real Estate sector. In addition we have also conducted separate company analysis and taken part in several stakeholder dialogues held by Swedish companies.
Outcomes	In total we have during 2016 screened 69 Swedish-listed companies regarding their sustainability work.

Add Example 3

Topic or ESG issue	Sustainability (ES)
Conducted by	Individual / Internal
Objectives	Companies developing strategies, goals and activities linked to climate change.
Scope and Process	Through dialogue we can influence companies to increase their investments in energy efficiencies and renewable energy sources. During the year, we contacted the ten companies on the Swedish stock exchange that are the largest dischargers of climate-changing gases with questions concerning measures to achieve emission reductions.
Outcomes	During the autumn, Swedbank Robur contacted the ten Swedish listed companies that emit the most carbon dioxide: SSAB, SCA, Boliden, Volvo, SKF, Telia, Skanska, Sandvik, Electrolux and AAK. The aim was to ask questions about the company's actions to reduce emissions. All the companies responded. They are well aware of the high emissions and are actively working to reduce them. The high emission levels for Volvo and Electrolux are mainly due to emissions associated with the use of the companies' products. In addition to its own production they are therefore focusing on developing energy-efficient products. SSAB's emissions occur mainly in production. To achieve further reductions in steel production requires investments in non-carbon-based technology. SSAB operates targeted development projects in cooperation with state-owned LKAB and Vattenfall. The possible positive effects for the industry are considerable, but the change-over time is long. In 2017, we will expand the dialogue to include more companies that we consider need to develop their climate work. All companies will also receive feedback with concrete proposals for development and improvement. More examples of themed dialogues can be found on the next page.

Add Example 4

Topic or ESG issue	Sustainability (ES)
Conducted by	Collaborative
Objectives	Shale oil and Shale Gas in the US (PRI Clearinghouse) - increasing investor knowledge and the companies' transparency and sustainability management
Scope and Process	Since 2013, Swedbank Robur has collaborated with 41 other investors with the UN initiative PRI on shale oil and shale gas in the United States. All in all the investors are managing USD 5100 billion in the companies concerned. "Fracking" or the extraction of shale oil is a controversial land-based extraction technology with a significant impact on the natural environment and on local communities. It requires large amounts of water and chemicals. A high rate of development has created many new and inexperienced players on the market, which in turn increases the challenges with regard to sustainability. Dialogues were conducted with 37 local and multinational oil companies. The objective was partly to increase investor knowledge of the industry and its sustainability aspects, partly to increase transparency and to improve the management of sustainability issues in the companies. 56 indicators were measured in the areas overall strategy and management, water use, emissions to soil, air and water, the impact on local communities and collaboration with stakeholders.
Outcomes	From its inception in 2013 until the time the dialogues ended in 2016, 87 per cent of the companies had improved within all dialogue areas. The transparency as to how the industry deals with sustainability issues has increased substantially which facilitates increased control. PRI compiled an investor guide for cooperation with companies that work with the extraction of shale oil and shale gas, as support for continued dialogue with the industry.

Add Example 5

Topic or ESG issue	Sustainability (ES)
Conducted by	Service provider
Objectives	FMC - No import of resources from occupied territories in Western Sahara
Scope and Process	The mining of phosphate at an open-cast mine in Boucraâ in Western Sahara is being implemented under the aegis of the Moroccan state-owned Groupe OCP (Office Chérifien des Phosphates) that has not been able to show that the mining operations were being carried out with due regard to the interests and wishes of the people of Western Sahara. Mining operations may thus involve a violation of the United Nations' Global Compact Principles 1 and 2 on human rights and the OECD's guidelines for multinational enterprises.
Outcomes	In 2016, Swedbank Robur and the service provider ISS-Ethix were in contact with FMC regarding the import of phosphate from the occupied territories in the Western Sahara. The company have now sold the division of the company that imported phosphate from the Western Sahara. After having also closed a factory in Spain that previously processed phosphate, they no longer have a factory that uses phosphate. At the end of 2015, FMC also developed a code of conduct for suppliers and will refrain from importing raw materials from the Western Sahara. We believe that the company has taken steps that give them a greater chance of respecting human rights.

Add Example 6

Topic or ESG issue	ES
Conducted by	Individual / Internal
Objectives	Responsible Gaming
Scope and Process	During the year we talked to gaming companies where Swedbank Robur's funds are the owner. Swedbank Robur invested early on in the Kindred Group (formerly the Unibet Group) and Betsson, and Swedbank also has holdings in companies that were listed later such as, Kambi Group, Evolution Gaming and LeoVegas. We identified early gambling addiction as a major risk for the gaming companies. The focus of the dialogues has therefore been to follow up on how they work to discover customers with risky gaming patterns and how they act to counter this abuse. We requested preventive actions, as well as systems and products that help customers to conduct safe gaming. We encouraged companies to become more open in their communication, to tell us how they act when incidents occur or when irregularities are detected. With increased competition in the gaming industry, the issue of responsible marketing has taken up more room in our dialogue. We want companies to have a policy and clear agreements with suppliers and partners and that they follow up and take action against any deviations that may occur
Outcomes	Companies such as Kindred Group and Betsson now report more and more about their own work and how they interact within the industry to drive development forward. We see that the listed companies are at different stages in their sustainability work and we will continue our dialogues with regard to our expectations and support them so that they can work systematically with safe gaming and responsible marketing.

Add Example 7

Add Example 8

Add Example 9

Add Example 10

LEA 16	Mandatory	Core Assessed	PRI 2,6
LEA 16.1 Indicate whether your organisation proactively discloses information on its engagements.			
<input checked="" type="checkbox"/> We disclose it publicly http://www.swedbankrobur.se/om-swedbank-robur/ansvarfulla-investeringar-hallbarhetsfonder/sa-jobbar-vi-med-ansvarfulla-investeringar/index.htm http://www.swedbankrobur.se/om-swedbank-robur/nyhetsbrev/index.htm			
LEA 16.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.			
<input checked="" type="checkbox"/> Yes			
LEA 16.3 Indicate what engagement information your organisation proactively discloses to clients/beneficiaries and/or the public.			
Engagement information disclosed			
<input type="checkbox"/> Details of the selections, priorities and specific goals of engagement <input checked="" type="checkbox"/> Number of engagements <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input type="checkbox"/> An assessment of the current status of the engagement <input type="checkbox"/> Outcomes that have been achieved from the engagement <input checked="" type="checkbox"/> Other information We quarterly publish a list of companies we contact on sustainability issues and continuously our representation in nomination committees.			
LEA 16.4 Indicate how frequently you report engagements information.			
<input type="radio"/> Disclosed continuously (prior to and post engagements) <input checked="" type="radio"/> Disclosed quarterly or more frequently <input type="radio"/> Disclosed biannually <input type="radio"/> Disclosed annually <input type="radio"/> Disclosed less frequently than annually <input type="radio"/> Ad hoc/when requested <input type="radio"/> No <input type="radio"/> We disclose it to clients and/or beneficiaries only <input type="radio"/> We do not proactively disclose it to the public and/or clients/beneficiaries.			
LEA 16.8 Additional information. [Optional]			
We published some information on our engagements publicly but not all. Some goals and outcomes were published as examples during 2016. KPIs on the progress of our engagement with our Watch List-companies (that is companies we have identified that have high sustainability risks and poor work) are published on a yearly basis. We quarterly publish a complete list of companies we have contacted on sustainability issues and on which topics. We publish how we have voted and in what companies we have participated in the nomination committees. See our report "Responsible Investor 2016": http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2271040.pdf Summary of companies we have contacted on sustainability issues 2016: http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2051487.pdf Nomination committees 2016: http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1808381.pdf			

LEA 17	Mandatory	Gateway	PRI 1,2,3
LEA 17.1 Indicate whether your organisation has a formal voting policy.			
<input checked="" type="checkbox"/> Yes			
LEA 17.2 Indicate what your voting policy covers:			
<input checked="" type="checkbox"/> Conflicts of interest <input checked="" type="checkbox"/> Prioritisation of voting activities <input checked="" type="checkbox"/> Transparency <input checked="" type="checkbox"/> Decision making processes <input checked="" type="checkbox"/> Environmental factors <input checked="" type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Filing/co-filing resolutions <input type="checkbox"/> Extraordinary meetings <input type="checkbox"/> Share blocking <input type="checkbox"/> Regional voting practices <input type="checkbox"/> Record keeping <input checked="" type="checkbox"/> Company dialogue pre/post vote <input checked="" type="checkbox"/> Securities lending process <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
LEA 17.3 Attach or provide a URL to your voting policy. [Optional]			
http://www.swedbankrobur.com/idc/groups/public/@i/@sbg/@sb/@robur/documents/publication/cid_283114.pdf			
LEA 17.4 Provide a brief overview of your organization's approach to (proxy) voting.			
We participate at General meetings in Sweden by attendance and outside of Sweden generally by proxy voting. Swedbank Robur can make exceptions from this if it is considered of minor importance for the fund unit-holders, for example if the shareholding is insignificant in relation to other shareholders' holdings 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. During the year we voted at 295 general meetings where of 124 in companies listed outside of Sweden and co-filed approximately 940 resolutions as part of nomination committees in 69 companies listed in Sweden. Co-filing of shareholder resolutions include nomination committee's proposal for the appointment of the board of directors and auditors, as well as their remuneration, the chair of the AGM and the principles for the nomination committee. Our Ownership policy includes guidelines for the exercise of voting rights in Companies listed outside of Sweden as well as when to participate in nomination committees. Outside of Sweden we have voted in US, Canada, within EU, Norway, Switzerland, Russia, South Africa, Japan and Taiwan.			
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).			
We are transparent about our proxy voting, publishing on our website both our Ownership policy and Vote summary general meetings.			
<input type="radio"/> No			

LEA 18	Mandatory	Descriptive	PRI 2
LEA 18.1 Indicate how you typically make your (proxy) voting decisions.			
Approach			
<input checked="" type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers.			
Based on			
<input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> 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]
 We use our own research or voting team and make our own decisions without the use of service providers (companies listed in Sweden). We hire service provider which make voting recommendations or provide research that we use to inform our voting decision (companies listed outside of Sweden).

LEA 20 Voluntary Descriptive PRI 2

LEA 20.1 Describe your involvement in any projects to improve the voting trail and/or to obtain vote confirmation.
 We get vote confirmation from our platform provider of proxy voting service. We selectively check outcome if possible. Occasionally we contact companies for confirmation. In Sweden we attend the AGMs in person and therefore this is not an issue.

LEA 21 Voluntary Additional Assessed PRI 2

LEA 21.1 Indicate if your organisation has a securities lending programme.
 Yes
 No

LEA 22 Mandatory Core Assessed PRI 2

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:
 Votes for selected markets
 Votes relating to certain ESG issues
 Votes for significant shareholdings
 Votes for companies we are engaging with
 On request by clients
 Other
 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

LEA 22.3 Additional Information. [Optional]
 In Sweden we inform in advance. Outside of Sweden we try to inform in advance if we have a significant holding otherwise after. Smaller holdings outside of Sweden we try to inform if we meet the company.

LEA 23 Mandatory Core Assessed PRI 2

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.
 We do track or collect this information

Votes cast (to the nearest 1%)
75%

 Specify the basis on which this percentage is calculated
 of the total number of ballot items on which you could have issued instructions
 of the total number of company meetings at which you could have voted
 of the total value of your listed equity holdings on which you could have voted

LEA 23.2 Explain your reason(s) for not voting certain holdings
 Shares were blocked
 Notice, ballots or materials not received in time
 Missed deadline
 Geographical restrictions (non-home market)
 Cost
 Conflicts of interest
 Holdings deemed too small
 Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
 We do not vote on environmental resolutions
 We do not vote on social resolutions
 On request by clients
 Other
 We do not track or collect this information

LEA 24 Mandatory Additional Assessed PRI 2

LEA 24.1 Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.
 Yes, we track this information

LEA 24.2 Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	62%
Against (opposing) management recommendations	38%
Abstentions	0%

 No, we do not track this information

LEA 24.4 Additional Information. [Optional]
 Normally if we are a large owner, as mostly in Swedish companies, we communicate with the Board and company management ahead of the general meeting in order to seek a solution that is acceptable and that we can vote for. It is therefore not often we have to vote against a proposal and we normally do not abstain from voting in such companies. Sometimes we vote for the proposal but make a statement at the AGM or suggest changes for the future.
 In 5 general meetings in companies listed in Sweden of 171 (3%) we did vote AGAINST at least one resolution.
 In 106 general meetings in companies listed outside of Sweden of 124 (85%) we did vote AGAINST at least one resolution.

LEA 25	Voluntary	Descriptive	PRI 2
LEA 25.1 Indicate if your organisation directly or via a service provider filed or co-filed any ESG shareholder resolutions during the reporting year.			
<input checked="" type="checkbox"/> Yes			
LEA 25.2 Indicate the number of ESG shareholder resolutions you filed or co-filed.			
940			
LEA 25.3 Indicate what percentage of these ESG shareholder resolutions resulted in the following.			
Went to vote			
100%			
Were withdrawn due to changes at the company and/or negotiations with the company			
0%			
Were withdrawn for other reasons			
0%			
Were rejected/not acknowledged by the company			
0%			
LEA 25.4 Of the ESG shareholder resolutions that you filed or co-filed and that were put to vote (i.e. not withdrawn) how many received:			
940			
LEA 25.5 Describe the ESG shareholder resolutions that you filed or co-filed and the outcomes achieved.			
Specification to 25.2.			
Number of joint resolutions 940 all in Sweden.			
69 Nomination Committees (with members normally appointed by the 3-6 largest shareholders) filed resolutions for:			
69 Chair of the AGM-All approved			
69 Numbers of directors on the board-All approved			
490 Directors (where of approximately 16% newly elected)-All approved			
69 Chair of the Board-All approved			
69 Remuneration for the board and board committees-All approved			
60 Auditors (approximately, some have still mandates longer than 1 year)-All approved			
69 Remuneration for the auditors-All approved			
45 Principles (approximately, some have mandates longer than 1 year)-All approved			
940 Total (approximately)			
<input type="checkbox"/> No			
LEA 25.6 Additional information. [Optional]			
The aim is to propose a board with a sufficient number of suitable candidates with relevant experience, qualifications, diversity (incl gender) and independence. In addition the auditors are evaluated with the assistance of the audit committee. It also includes reviewing and proposing changes to the principles for the formation of the nomination committee if deemed appropriate.			

LEA 26	Voluntary	Descriptive	PRI 2
LEA 26.1 Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.			
<input checked="" type="checkbox"/> Add Example 1			
Topic or ESG issue	Governance		
Decision made by	Internal staff		
Objectives	To ensure that executive remuneration is in line with shareholder interest		
Scope and Process	Tougher performance criteria and more reasonable dilution and/or cost. Better disclosure of performance criteria etc.		
Outcomes	LTIP related discussions with some 40 companies. 10 were influenced to modify programs.		
<input type="checkbox"/> Add Example 2			
<input type="checkbox"/> Add Example 3			
<input type="checkbox"/> Add Example 4			
<input type="checkbox"/> Add Example 5			
<input type="checkbox"/> Add Example 6			
<input type="checkbox"/> Add Example 7			
<input type="checkbox"/> Add Example 8			
<input type="checkbox"/> Add Example 9			
<input type="checkbox"/> Add Example 10			

LEA 27	Mandatory	Core Assessed	PRI 2,6
LEA 27.1 Indicate if your organisation proactively discloses information on your voting activities.			
<input checked="" type="checkbox"/> We disclose it publicly			
http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1962634.pdf http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1962649.pdf			
LEA 27.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.			
<input checked="" type="checkbox"/> Yes			
LEA 27.3 Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.			
Indicate how much of your voting record you disclose			
<input checked="" type="checkbox"/> All voting decisions			
<input type="checkbox"/> Some voting decisions			
<input type="checkbox"/> Only abstentions and opposing vote decisions			
<input type="checkbox"/> Summary of votes only			
Indicate what level of explanation you provide			
<input type="checkbox"/> Explain all voting decisions			
<input checked="" type="checkbox"/> Explain some voting decisions			
<input type="checkbox"/> Only explain abstentions and votes against management			
<input type="checkbox"/> No explanations provided			
LEA 27.4 Indicate how frequently you typically report voting information.			
<input type="checkbox"/> Continuously (primarily before meetings)			
<input checked="" type="checkbox"/> Continuously (soon after votes are cast)			
<input type="checkbox"/> Quarterly or more frequently			
<input type="checkbox"/> Biannually			
<input type="checkbox"/> 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

FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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FI 01.1		Provide a breakdown of your internally managed fixed income securities by active and passive strategies	
Corporate (financial)	0	Passive	
	0	Active - quantitative (quant)	
	100	Active - fundamental and active - other	
Corporate (non-financial)	0	Passive	
	0	Active - quantitative (quant)	
	100	Active - fundamental and active - other	

FI 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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FI 03.2		Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.	
Corporate (financial)	5	High-yield	
	95	Investment grade	
Corporate (non-financial)	5	High-yield	
	95	Investment grade	

FI 04	Mandatory	Gateway	PRI 1
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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.	
Corporate (financial)	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	
	Corporate (non-financial)	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	

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

The board of Swedbank Robur adopted a Policy on Responsible Investment in early 2015. The policy has been implemented into the legal regulation of the funds continuously during 2015-2016 with the end date 7 January 2017. The policy clarifies Swedbank Robur's responsibilities and the focus areas of ownership work, integration in investment processes and when company exclusions is the option.

Our main ESG incorporation strategy for fixed income has been company exclusions (screening). We do not invest in companies that produce cluster munitions, anti-personnel mines, chemical and biological weapons and nuclear weapons. Neither in companies that have coal production amounting to 30 % of its turnover and above. The exclusions started in 2009 with companies producing cluster munitions and anti-personal-mines.

From 7 January 2017 we will also work with a more thorough process for integration of ESG-analysis into the investment process.

FI 05	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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FI 05.1		Indicate which ESG factors you systematically research as part of your analysis on issuers.	
	Corporate (financial)	Corporate (non-financial)	
Environmental data	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.	

Social data	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.
Governance data	<input checked="" type="checkbox"/> Fin.	<input checked="" type="checkbox"/> Corp.

FI 05.2 Indicate what format your ESG information comes in and where you typically source it

- Raw ESG company data
- ESG factor specific analysis
- Issuer-level ESG analysis
- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify
- Sector-level ESG analysis
- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify
- Country-level ESG analysis

FI 05.3 Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

The sources of the ESG information used is sellside analysts, inhouse ESG-specialists and the work of in-house PMs

FI 06	Mandatory	Additional Assessed	PRI 1
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FI 06.1 Indicate how you ensure that your ESG research process is robust:

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

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

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

We do not invest in companies that produce cluster munitions, anti-personnel mines, chemical and biological weapons, nuclear weapons and companies that have coal production amounting to 30 % of its turnover and above.

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

Corporate (fin)
<input type="checkbox"/> For legal reasons
<input checked="" type="checkbox"/> For non-legal reasons

Corporate (non-fin)
<input type="checkbox"/> For legal reasons
<input checked="" type="checkbox"/> For non-legal reasons

FI 08.2 Describe your approach to ESG-based negative screening of issuers from your investable universe.

Our main ESG incorporation strategy for fixed income has been company exclusions (screening). We do not invest in companies that produce cluster munitions, anti-personnel mines, chemical and biological weapons and nuclear weapons. Neither in companies that have coal production amounting to 30 % of its turnover and above. The exclusions started in 2009 with companies producing cluster munitions and anti-personal-mines.

The board of Swedbank Robur adopted a Policy on Responsible Investment in early 2015. The policy has been implemented into the legal regulation of the funds continuously during 2015-2016 with the end date 7 January 2017. The policy clarifies Swedbank Robur's responsibilities and the focus areas of ownership work, integration in investment processes and when company exclusions is the option.

FI 09	Voluntary	Additional Assessed	PRI 1
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FI 09.1 Provide examples of how ESG factors are included in your screening criteria.

Example 1

Type of fixed income
<input type="checkbox"/> Corporate (financial)
<input checked="" type="checkbox"/> Corporate (non-financial)

ESG factors
<input type="checkbox"/> Environmental
<input type="checkbox"/> Social
<input checked="" type="checkbox"/> Governance

Screening	
<input checked="" type="checkbox"/> Negative/ exclusionary	
Description of how ESG factors are used as the screening criteria	
L-3 Communications, Lockheed Martin and Textron are three examples of companies that have been excluded from investments due to their link to the production of cluster munition and/or nuclear weapons. The total list can be found on our website.	
<input checked="" type="checkbox"/> Example 2	
Type of fixed income	
<input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)	
ESG factors	
<input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Governance	
Screening	
<input checked="" type="checkbox"/> Negative/ exclusionary	
Description of how ESG factors are used as the screening criteria	
UK Coal, Coal India and Cloud Peak Energy are three examples of companies that have been excluded from investments due to the production of coal (more than 30 % of the turnover). The total list can be found on our website.	
<input type="checkbox"/> Example 3 <input type="checkbox"/> Example 4 <input type="checkbox"/> Example 5	

FI 10	Mandatory	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.	
Type of screening	Checks
Negative/exclusionary screening?	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input 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 18	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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FI 18.1 Indicate if you engage on your fixed income assets. Please exclude any engagements carried out solely in your capacity as a shareholder.	
Category	Proportion of assets
Corporate (financial)	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5% <input checked="" type="radio"/> We do not engage
Corporate (non-financial)	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5% <input checked="" type="radio"/> We do not engage

FI 18.3 Additional information,[OPTIONAL]

In 2016 we conducted ESG-engagement linked to fixed income assets only in companies in which we had ownership through equity investments, that is in companies that we were a shareholder in. The engagement was carried out mainly through our internal ESG-specialists and Equity Portfolio Managers.

More than 50 % of the AUM of corporate non-financials are Swedish and emitted from the Swedish companies of which Swedbank Robur often is a large owner. Swedbank Robur is the third largest owner on the Swedish stock exchange. This means in practice that we have ESG-engagement or voting activities with approximately half of the companies that have emitted the fixed income securities in which we have invested in.

FI 21	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
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FI 21.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.		
	Corporate (financial)	Corporate (non-financial)
We measure whether incorporating ESG impacts funds' reputation	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.
We measure whether incorporating ESG impacts financial returns	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.
We measure whether incorporating ESG impacts risk	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.
We measure whether incorporating ESG impacts funds' ESG performance	<input type="checkbox"/> Fin.	<input type="checkbox"/> Corp.
None of the above	<input checked="" type="checkbox"/> Fin.	<input checked="" type="checkbox"/> Corp.

FI 21.2 Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

Our current judgement is that the ESG incorporation has not influenced the financial returns in a negative way.

FI 23	Mandatory	Core Assessed	PRI 2,6
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FI 23.1 Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.	
<input checked="" type="checkbox"/> We disclose it publicly http://www.swedbankrobur.se/ldc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdfhttp://www.swedbankrobur.se/om-swedbank-robur/ansvarfulla-investeringar-hallbarhetsfonder/nyhetsbrevet-ansvar-paverkan/index.htm	
FI 23.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.	
<input checked="" type="checkbox"/> 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 do not proactively disclose it to the public and/or clients/beneficiaries

FI 23.7 Additional information. [Optional]

- Please see our report "Responsible Investments 2016": http://www.swedbankrobur.se/idc/groups/public/@il/@sc/@all/@robur/documents/article/cid_2271040.pdf
- The "Swedbank Robur Polycyn on Responsible Investments" is published in Swedish and available through the link in 23.1 above. The English version will be published on the website in Q2.