




LEA 02	Mandatory	Reason	Page 123
Type of engagement Individual/ internal staff engagements Collaborative engagements Service provider engagements		Reason for interaction - To support investment decision-making by company leaders - To enhance corporate systems or identify areas for improvement - To ensure timely - To support investment decision-making by company leaders - To enhance corporate systems or identify areas for improvement - To ensure timely - To support investment decision-making by company leaders - To enhance corporate systems or identify areas for improvement - To ensure timely	

RI TRANSPARENCY REPORT 2018

Swedbank Robur

OO 01	Mandatory	Gateway/Peering	General
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OO 01.1 Select the services and funds you offer

Fund management

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Fund of funds, manager of managers, sub-advised products

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Other, specify

OO 02	Mandatory	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

Sweden

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

1

2-5

6-10

>10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

215

OO 03	Mandatory	Descriptive	General
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OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

No

OO 04	Mandatory	Gateway/Peering	General
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OO 04.1 Indicate the year end date for your reporting year.

31/12/2017

OO 04.2 Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.

Total AUM

871,695,000,000 SEK

103,961,098,421 USD

OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes:

	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

OO 05.2 Indicate whether your organisation uses fiduciary managers.

Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.

No, we do not use fiduciary managers.

OO 06 **Mandatory** **Descriptive** **General**

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

as percentage breakdown

as broad ranges

OO 07 **Mandatory to Report, Voluntary to Disclose** **Gateway** **General**

OO 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.

Internally managed	15	SSA
	15	Corporate (financial)
	20	Corporate (non-financial)
	50	Securitised

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

OO 10 **Mandatory** **Gateway** **General**

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement

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.

Listed equity – voting

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

Fixed income SSA – engagement

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. Please explain why you do not.

Fixed income Corporate (financial) – engagement

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. Please explain why you do not.

Fixed income Corporate (non-financial) – engagement

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. Please explain why you do not.

Fixed income Corporate (securitised) – engagement

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. Please explain why you do not.

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).

Listed equity

We address ESG incorporation.
 We do not do ESG incorporation.

Fixed income - SSA

We address ESG incorporation.
 We do not do ESG incorporation.

Fixed income - corporate (financial)

We address ESG incorporation.
 We do not do ESG incorporation.

Fixed income - corporate (non-financial)

We address ESG incorporation.
 We do not do ESG incorporation.

Fixed income - securitised

We address ESG incorporation.
 We do not do ESG incorporation.

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules

Organisational Overview
 Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

Listed Equity incorporation

Direct - Listed Equity active ownership

Engagements
 (Proxy) voting

Direct - Fixed Income

Fixed income - Corporate (financial)
 Fixed income - Corporate (non-financial)

Closing module

Closing module

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

7

Passive

11

Active - quantitative (quant)

82

Active - fundamental and active - other

OO LE 02 Mandatory to Report, Voluntary to Disclose Gateway General

OO LE 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

Yes

No

OO FI 01 Mandatory to Report, Voluntary to Disclose Gateway General

OO FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

SSA	0	Passive
	0	Active - quantitative (quant)
	100	Active - fundamental and active - other
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
Securitised	0	Passive
	0	Active - quantitative (quant)
	100	Active - fundamental and active - other

OO FI 03 Mandatory to Report, Voluntary to Disclose Descriptive General

OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

SSA	100	Developed markets
	0	Emerging markets

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

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues

SG 01.3a CC Describe how your products or investment strategy might be affected by the transition to a lower-carbon economy.

We closely evaluate and take into account in investment decision making the regular specialist research from our service providers, as well as the robust evidence in the public domain and the responsible investing branch climate change and carbon. Our aim is to act on this existing knowledge in the near term in order to align our funds with the Paris Agreement two-degree or less scenario, by tilting our investments away from high scope 1,2 and 3 emitters towards less carbon intensive companies, and maximizing opportunities within emergent low carbon technologies and climate adaptation solutions/positions. However, strictly speaking Swedbank Robur does not conduct its own climate and carbon scenario analysis or modelling.

As a result of our recently strengthened Policy for Responsible Investments and our stated goal of increased integration, our fund managers have good access to climate and carbon related information and incorporate it into their decision making processes. Swedbank Robur also discusses these issues in branch circles such as SWESIF, PRI, and the Swedish Investment Fund Association.

In February 2016, the Swedish Financial Supervisory Authority released a consultant's report entitled: "The effects of climate change on financial stability, with particular reference to Sweden". The report's policy section raises the issue of stress testing and found that: "the informal stress tests of climate risk and carbon risk carried out by analysts outside the financial sector have been broadly reassuring but they have identified areas of concern and drawn attention to the heterogeneity of the sector. The insurance sector was found to be most exposed, however a Bank of England Prudential Regulation Authority report cited in the paper (2015) stopped short of insisting that climate risk should be included in regulatory stress tests for insurance companies. Some other findings of the report were that:

"Swedish firms have already adapted to a regime of ever more stringent climate change mitigation policies and have therefore decoupled emissions and economic activity more than producers in most OECD countries."

Overall, the report does not suggest that climate change and its mitigation pose major new risks for Swedish financial firms or Swedish financial stability".

Despite these relatively positive findings, Swedbank Robur's Risk & Compliance and Sustainability teams discussed the findings of the report during 2016 in order stay informed of the expert opinion, and to anticipate and plan for any new regulatory requirements within this area.

SG 01.3b CC Describe how climate-related risks and opportunities are factored into your investment strategies or products.

✓ We factor climate-related risks and strategies into our investment strategies or products.

Swedbank Robur has been measuring and reporting its equity funds' carbon footprints since 2015, and in 2016 a step change in improvement was observed. This is primarily the result of implementing coal production exclusions during the year, but is also related to the development of our position papers on Climate Impact and Energy Usage and Fossil Fuel Production in 2015 and Policy for Responsible Investments (2016).

Implementation of our Policy for Responsible Investments addresses climate and carbon in three ways relating to the three Integration, Dialogue and Exclusions pillars.

INTEGRATION: Our integration project has resulted in significantly increased access to, and usage of, ESG information by our fund managers. Systems have been implemented which enable them to access ratings, carbon emissions related research and data, and norms breach information from our service providers. Norms data is important because in addition to climate it also contains information on companies involved in deforestation and environmental degradation issues. Regular meetings with the in-house sustainability team are also in place to discuss our own and procured research. Morningstar Globe ratings are internally reported, serving to further incentivize ESG data integration, which in turn drives selection for better performing companies and lower carbon

emissions portfolios.

DIALOGUE. In total, climate and carbon was the main theme in 25 percent of Swedbank Robur's corporate dialogues during 2016-17, and was raised probably in over 50 percent of meetings. Our climate and carbon related dialogue takes place in the following ways:

As part of our program of regular meetings with companies in which we are large owners,
 Via PRI collaborations – eg. on Fracking, Carbon Disclosure and Methane emissions in the last three years, as well as signing a letter to G20 finance ministers lobbying for climate to be put on their 2017 meeting agenda;
 During our own thematic initiatives such as commencing carbon engagement with Sweden's top 10 emitters in 2016;
 As part of stakeholder dialogue where companies seek our input on sustainability reporting and key issues. Here we routinely highlight the importance of carbon management, where we have identified the issue as one of the key aspects; and
 As part of our watch list engagement with companies where we hold discussions on climate and carbon, for example during meetings with mining and hydrocarbon companies we routinely lobby for corporate level target setting and the phase-out of coal extraction and other high emissions operations.

We exert our influence as owners in advance of and in connection to general meetings. When our funds are a major owner in Swedish listed companies, we participate in nomination committees and file joint resolutions. During 2017 we participated in 81 nomination committees (2016: 69, 2015: 59 and 2014:61). The average number of directors proposed in these boards was seven. All proposed directors were elected by the AGM. The engagement and participation in nomination committees includes strategic discussions, including sustainability, with Chair and CEO, evaluation of present board, review of board evaluations, interviews with present board members, identifying profiles of new candidates and interviews with potential candidates.

EXCLUSIONS. The exclusion pillar in our policy also positively impacts portfolio carbon foot prints, primarily via:

The exclusion of coal production companies (>30% income) in all funds (2016);
 The exclusion of fossil fuel producers and norms breaching companies within our Ethica fund family (2015);
 The implementation of strict carbon emissions management criteria for other high emitting industries within the Ethica funds (2015). The criteria require such companies to have industry leading mitigation measures in place as well as strong corporate level emissions reduction targets.
 Our in-house sustainability team and Sustainability Council ("Hållbarhetsrådet") quality-controls our externally sourced information and makes all final decisions on exclusions (as well as watch-listing, and inclusion/exclusion of companies within the Ethica funds).

Low carbon intensity compared to peers

In July 2017, the Climetrics global rating of the climate impact of funds was launched. The Carbon Disclosure Project (CDP) together with ISS-Ethix Climate Solutions has created the ranking that includes 2500 European funds. The ranking reflects the climate impact of the companies the fund has invested in, but also the asset manager's own work on climate in investment and ownership. The result is presented on a scale of one to five, where five represents best performance. Only eight percent of the funds in the survey were awarded the highest rating. **14 of Swedbank Robur's funds received the highest rating and three funds second highest rating. According to Climetrics, Swedbank Robur currently holds the highest proportion of funds in the Nordic countries with a top ranking on climate.** This provides further evidence that our long-term commitment to reducing the climate impact of our funds is yielding industry leading results.

We do not factor climate-related risks and strategies into our investment strategies or products.

Other RI considerations, specify (1)

Other RI considerations, specify (2)

SG 01.4 Describe your organisation's investment principles and overall investment strategy, and how they consider ESG factors and real economy impact.

The overall investment strategy for Swedbank Robur builds on a sustainable values to generate return for our clients and to be an long-term active owner that takes part in the public economic discussions as well as having an attractive fund offering for our clients.

No

SG 02 Mandatory Core Assessed PRI 6

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
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdf
<input type="checkbox"/> 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
<input type="checkbox"/> URL
<input checked="" type="checkbox"/> Attachment (will be made public) Files: link , link , link , link , link , link , link , link

Screening / exclusions policy

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdf

Attachment (will be made public)

Engagement policy

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.com/idc/groups/public/@i/@sbg/@sb/@robur/documents/publication/cid_283114.pdf
<input type="checkbox"/> Attachment (will be made public)

(Proxy) voting policy

We do not publicly disclose our investment policy documents

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

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

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

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdf
<input type="checkbox"/> Attachment

ESG incorporation approaches

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/
<input type="checkbox"/> Attachment

Active ownership approaches

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.se/om-swedbank-robur/sa-paverkar-vi-bolag-agarstyrning/
<input type="checkbox"/> Attachment

Climate change and related issues

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/
<input type="checkbox"/> Attachment

We do not publicly disclose any investment policy components

SG 02.3 Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

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

No

SG 02.4 Additional information [Optional].

Our webpage describing our work as a Responsible Investor can be found via these link (in SWEDISH):

<http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/>

<http://www.swedbankrobur.se/om-swedbank-robur/sa-paverkar-vi-bolag-agarstyrning/>

SG 03 Mandatory Core Assessed General

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.

During the year Swedbank Robur's Board of Directors consisted of 4 members. Essential governance matters are decided by the Board. Swedbank Robur's Articles of Association requires that at least a majority 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
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
SG 04.2	Describe your process on managing incidents		
Swedbank Robur procures norms-based incident alerting and analysis from two specialist norms service providers (GES and ISS-Ethix). Alerts enter our organization via the sustainability team, who then distribute these to the relevant fund managers on a weekly basis. Where a credible, serious Alert might result in significant impact or reputational risk to Swedbank Robur we contact the company directly ourselves and commence engagement. In parallel, our service providers commence their own similar process, which results in an eventual recommendation regarding norms breach confirmation. We further subscribe to ISS-Ethix' engagement service, where longer term dialogue is conducted. A selection of confirmed norms breach cases are also placed on Swedbank Robur's own internal Watch List, with a goal based dialogue conducted by our own in-house team.			

SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
<input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed			

SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Responsible investment processes			
<input checked="" type="checkbox"/> Provide training on ESG incorporation			
Key performance indicator			
Nomination committee received training on ESG incorporation as well as providing the fund managers with ESG information 2/yr.			
Progress achieved			
Training for Nomination Committee was done in December 2017.			
<input type="checkbox"/> Provide training on ESG engagement			
<input checked="" type="checkbox"/> Improved communication of ESG activities within the organisation			
Key performance indicator			
Training regarding ESG activities for the sales support team.			
Progress achieved			
The training was done continuously during the year.			
<input type="checkbox"/> Improved engagement to encourage change with regards to management of ESG issues			
<input type="checkbox"/> Improved ESG incorporation into investment decision making processes			
<input type="checkbox"/> Other, specify (1)			
<input type="checkbox"/> Other, specify (2)			
<input type="checkbox"/> Other, specify (3)			
Financial performance of investments			
<input checked="" type="checkbox"/> Increase portfolio performance by consideration of ESG factors			
Key performance indicator			
Morningstar Sustainability Rating			
Progress achieved			
The Morningstar Sustainability Rating will be used to evaluate the equity portfolio managers.			
<input type="checkbox"/> Other, specify (1)			
<input type="checkbox"/> Other, specify (2)			
<input type="checkbox"/> Other, specify (3)			
ESG characteristics of investments			
<input checked="" type="checkbox"/> Over or underweight companies based on ESG characteristics			
Key performance indicator			

- Done with regards to the Morningstar Sustainability rating.
- Improve ESG ratings of portfolio
- Setting carbon reduction targets for portfolio
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Other activities

- Joining and/or participation in RI initiatives
- Encouraging others to join a RI initiative
- Documentation of best practice case studies

Key performance indicator

Annual Responsible Investment Report (Ansvarsfulla Investeringar) as well as a list of contacted companies.

Progress achieved

The Annual Responsible Investment Report is released in Swedish in Mars/April every year (the English version normally during the summer): http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2616464.pdf

Link to the list of contacted companies: http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2272183.pdf

- Using case studies to demonstrate engagement and ESG incorporation to clients

Key performance indicator

Annual Responsible Investment Report (Ansvarsfulla Investeringar)

Progress achieved

The Annual Responsible Investment Report is released in Swedish in Mars/April every year (the English version normally during the summer) http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2616464.pdf

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

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

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Head of Sustainability
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

- Investment analysts
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify (1)

Other description (1)
Nomination committee members
<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 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.
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CEO and senior management

Swedbank Robur has a system of quarterly meetings with our Sustainability Council, where discussions and decisions are taken on climate and ESG issues relating to policy, strategy, fund products, exclusions, investments etc. The council comprises the CEO, Vice CEO, Head of Equities, Heads of the various fund classes and the Head of Sustainability.

Portfolio managers

Integrate ESG data into company and fund analysis and decision making. Track progress on company ratings, fund Morningstar Sustainability Ratings and carbon footprint. Implement our RI policy.

ESG portfolio manager

As above, also selection of companies which meet the strict criteria or the ESG-focussed funds.

Dedicated ESG staff

Overall responsibility for ESG data and analysis procurement, own analysis, integration, engagement, compliance, managing exclusions, and input into policy and strategy.

Nomination Committee members

Responsible for understanding the key ESG issues for their sectors and companies and assessing the competence of Board members to appropriately manage these issues.

SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
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SG 07.4	Additional information. [Optional]
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An additional 12 are involved part time. That is appointed members in nomination committees (CEO, independent board members and other external people).

SG 07 CC	Voluntary	Descriptive	General
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SG 07.1 CC	Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for climate-related issues.
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Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues
- Other Chief-level staff or head of department, specify
 - Head of Sustainability
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues
- Portfolio managers
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues

- No responsibility for climate-related issues
- ESG portfolio manager
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues/responsible investment
- Investment analysts
- Dedicated responsible investment staff
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues
- External managers or service providers
 - Oversight/accountability for climate-related issues
 - Assessment and management of climate-related issues
 - No responsibility for climate-related issues
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

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.

Board members/Board of trustees Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- 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

Other C-level staff or head of department

Head of Sustainability

- 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

Portfolio managers

- 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
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- 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

Dedicated responsible investment staff

- 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

Other role (1) [from SG 07]

Nomination committee 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 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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Participated in PRI collaborative engagements on palm oil, methane, human rights in extractives and carbon and climate transparency during 2017.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- 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)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable
- 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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Swedbank Robur is a member of ICGN. During 2017 we attended the ICGN conference in Paris. https://www.icgn.org/

- 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)
Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Participated in most SWESIF workshops and seminars during 2017. http://www.swesif.org/

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

	Your organisation's role in the initiative during the reporting period (see definitions)
Basic	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	Swedbank is an UNGC signatory and Swedbank Robur's procured norms analysis is based on the UNGC principles.
<input checked="" type="checkbox"/>	Other collaborative organisation/initiative, specify
	Swedish Institutional Investors Association (Institutionella Ägares Förening, IÄF)
	Your organisation's role in the initiative during the reporting year (see definitions)
Advanced	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	The Director Corporate Governance at Swedbank Robur is on the board. The members of IÄF are the 16 largest Swedish institutional owners. IÄF is one of the principals of the Association for Generally Accepted Principles in the Securities Market that pursues its purpose through its specialist bodies: - the Swedish Securities Council, - the Swedish Corporate Governance Board, - the Swedish Financial Reporting Board.
<input checked="" type="checkbox"/>	Other collaborative organisation/initiative, specify
	The Swedish Corporate Governance Board (Kollegiet för svensk bolagsstyrning)
	Your organisation's role in the initiative during the reporting year (see definitions)
Advanced	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	The Head of Corporate Governance at Swedbank Robur is on the board. http://www.corporategovernanceboard.se/
<input checked="" type="checkbox"/>	Other collaborative organisation/initiative, specify
	Own collaborative engagement projects
	Your organisation's role in the initiative during the reporting year (see definitions)
Advanced	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	Our own collaborative engagement projects: - In Brazil with European investors engaging on the Samarco mining incident and national level corruption scandals (Petrobras scandal) with multiple companies. - In the Nordic region engaging and undertaking site visits to paper and forestry operations with Nordic investors. - Engaging with European utility companies on climate and carbon, as a follow-up project to CDP's utilities report (2017). With other Nordic investors.
<input checked="" type="checkbox"/>	Other collaborative organisation/initiative, specify
	Swedish Investment Fund Association (Fondbolagens Förening) a member of the European Fund and Asset management Association
	Your organisation's role in the initiative during the reporting year (see definitions)
Advanced	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	The CEO of Swedbank Robur Fonder is on the board and Swedbank Robur participates in the working group for Corporate Governance/SRI. http://fondbolagen.se/en/About-us/

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

Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work

Description
Discussions with research institute Misum about market development and need for new research within Stockholm Sustainable Finance Centre, a collaboration for research, innovation and education on sustainable finance.

Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently

- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
Several discussions in seminars and Swedish Investment Fund Association.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

Spoke publicly at events and conferences to promote responsible investment

Description
Our CEO is often speaking at various events and conferences about the importance of responsible investing and our sustainable vision as a asset manager.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media

Description
Done by both Head of Sustainability and CEO. Also publish quarterly newsletters.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

A member of PRI advisory committees/ working groups, specify

Description
PRI collaborative engagement projects on methane, carbon/climate transparency, human rights in extractives and palm oil.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

SG 10.3 Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

Participated in numerous (at least two per quarter) external studies/audits conducted by NGO's, branch organisations and fund-branch analyst firms.

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 <ul style="list-style-type: none"> <input checked="" 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 checked="" type="checkbox"/> Participated in face-to-face meetings with government members or officials to discuss policy <input type="checkbox"/> Other, specify			
SG 11.3	Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.		
<input type="radio"/> Yes, publicly available <input checked="" type="radio"/> No <input type="radio"/> No			

SG 12	Mandatory	Core Assessed	PRI 4
SG 12.1	Indicate whether your organisation uses investment consultants.		
<input checked="" type="checkbox"/> Yes, we use investment consultants			
SG 12.4	Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.		
<input type="checkbox"/> Custodial services <input type="checkbox"/> Investment policy development <input type="checkbox"/> Strategic asset allocation <input checked="" type="checkbox"/> Investment research			
<div style="border: 1px solid black; padding: 5px;"> <p>Describe how responsible investment is incorporated</p> <p>Drives company selection in our funds with specific focus on sustainability, and is integrated into decision making across of all of the Swedbank Robur funds. Used for weapons, pornography and coal production exclusions across all funds. Used for generating our fund's carbon footprint reports. Used for monitoring sector and ESG topic trends and identifying sustainable investment opportunities.</p> </div>			
<input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify (2) <input type="checkbox"/> Other, specify (3) <input type="checkbox"/> None of the above			
<input type="checkbox"/> No, we do not use investment consultants.			

SG 13	Mandatory	Descriptive	PRI 1
SG 13.1	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 consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities <input type="checkbox"/> We execute other scenario analysis, specify <input checked="" type="checkbox"/> We do not execute such scenario analysis and/or modelling			
SG 13.3	Additional information. [OPTIONAL]		
<p>Strictly speaking Swedbank Robur does not conduct its own scenario analysis or modelling on ESG issues. We do however closely evaluate and take into account in investment decision making the regular specialist research from our service providers, as well as the robust evidence in the public domain and the responsible investing branch on ESG issues. Our aim is to act on this existing knowledge in the near term in order to maximise ESG related opportunities and minimise and risk and impact. The UNSDG's provide a common framework for fund managers to take account of the most salient existing and emerging ESG issues, and during 2017 Swedbank (including Robur) has undertaken an evaluation of how we can integrate SDG's issues into our stock picking and product fund offerings.</p>			

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
SG 14.1	Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities.		
<p>In house research on company ESG risk and opportunities, as well as decision making for the Swedish Ethica funds. ESG engagement dialogue with</p>			

approximately 300 companies annually as well as approximately 2000 company meetings conducted by our fund managers. Procured research on company ratings from two service providers, norms research from two service providers, proxy voting, and carbon metrics. In addition, broker research on range of ESG trends and topics and participation in relevant workshops, conferences and other fora. Integration of research information into fund management via regular meetings between ESG and fund management teams and full fund manager access to the ESG research via the various platforms.

SG 14.1 CC Describe the processes used to determine which climate-related short, medium and long-term risks and opportunities could have a material impact on your organisation and its activities.

Strictly speaking Swedbank Robur does not conduct its own climate and carbon scenario analysis or modelling. We do however closely evaluate and take into account in investment decision making the regular specialist research from our service providers, as well as the robust evidence in the public domain and the responsible investing branch climate change and carbon. Our aim is to act on this existing knowledge in the near term in order to align our funds with the Paris Agreement two-degree or less scenario, by tilting our investments away from high scope 1,2 and 3 emitters towards less carbon intensive companies, and maximizing opportunities within emergent low carbon technologies and climate adaptation solutions/positions.

SG 14.2 Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.

- Changing demographics
- Climate change and related issues

SG 14.2a cc Please describe how you define "short", "medium" and "long term", and describe your material climate-related issues over these time horizons.

	Definition	Description of material climate-related issues
Short term	Currently our research and consideration of climate and carbon related issues is not formally broken down into short, medium and long term categories (although it could be placed into these categories if such a need was identified). Developments with this space are however constantly monitored, and fund managers act on this information accordingly. An example is the increasing frequency of meetings with companies and analysts to discuss renewable power and electric vehicle developments as these issues start to mature and become material to investment cases. This is a gradual but continuous process, rather than a step-wise one. Please also refer to previous responses on climate risk and scenarios.	
Medium term		
Long term		

SG 14.3 Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

SG 14.4 Indicate which of the following tools you use to manage emissions risks and opportunities

- Scenario analysis
 - Disclosure on emissions risk to clients/trustees/management/beneficiaries
 - Climate-related targets
 - Encourage internal and/or external portfolio managers to monitor emissions risk
 - Emissions risk monitoring and reporting are formalised into contracts when appointing managers
 - Weighted average carbon intensity
 - Carbon footprint (scope 1 and 2)
 - Portfolio carbon footprint
 - Total carbon emissions
 - Carbon intensity
 - Exposure to carbon-related assets
 - Other emissions metrics
 - Other, specify
 - None of the above
- Resource scarcity
 - Technology developments
 - Other, specify(1)
 - Other, specify(2)
 - None of the above

SG 14.4a CC		Please provide further details on these key metric(s) used to assess climate related risks and opportunities.				
Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology	Metric Trend	Limitations / Weaknesses
Portfolio carbon footprint	Pure equity fund portfolios only.	Comparison with index. Communication with fund managers. Externally reported biannually.	Tonnes CO2 per million Swedish kronor	Total carbon emissions for a portfolio normalized by the market value of the portfolio, expressed in tons CO2e / SEK M invested. Scope 1 + 2 and Scope 1 + First Tier Indirect Coverage must be $\geq 75\%$ of the market value of the fund's shareholdings.	Started measuring in 2014. Decreased after 2015 (but now stable) when we excluded fossil fuels producers from our ethical funds then coal producers across the board.	Doesn't predict future risk. Metric does not take into account differences in the size of companies (e.g., does not consider the carbon efficiency of companies). Changes in underlying companies' market capitalisation can be misinterpreted. Doesn't predict future risk. Changes in underlying companies' market capitalisation can be misinterpreted.

SG 14.5 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 internally and externally (public) report the carbon footprint of approximately 40 equity funds biannually.

SG 14.7 CC Describe your risk management processes for identifying, assessing, and managing climate-related risks.

Our process for climate-related risks is integrated into overall risk management
 Our process for climate-related risks is not integrated into our overall risk management

Please describe

Swedbank Robur has an approach to climate and carbon which aligns with our policy, that is we:

- Integrate CC data into fund management;
- Exclude companies based on coal and fossil fuel production; and
- Engage with companies in order to facilitate emissions reductions and better preparedness.

We have also conducted preliminary discussions with our investor risk function on overall organisational risk.

CC are partially integrated, not wholly, because we have basic integration at the fund management level but have not yet developed or communicated an organisational strategy such as that required by TCFD.

SG 14.8 CC Describe your processes for prioritising climate-related risks.

In our ethical funds, which represent less than 10% of our invested capital, we exclude all fossil fuel producers and service companies, and all utilities with coal fired power generation in line with the funds' Nordic Swan certifications. Across all high CO2 emitting sectors we also exclude from these funds a selection of companies with high emissions and poor climate related targets and management systems. Across ALL Swedbank Robur funds we exclude companies producing coal (>30% revenue).

We report portfolio carbon footprints in relation to indexes internally to the fund managers so that they can be aware of funds' impact. During 2016 Swedbank Robur's investor risk function and sustainability team made preliminary investigations into climate risk and resilience of the organisation. During 2017, Paris Agreement compliance became an assessed norm for potential breaches with both of our norms service providers, which may have further implications for certain funds. We have expressed our intentions to reduce our footprint further, work with SDG 13, implement a management system and targets in line with TCFD and are investigating carbon footprint reporting of our fixed income funds. We intend to increase our dialogue efforts in order to complement our analysis and understand company risk and preparedness better.

SG 14.9 CC Do you conduct engagement activity with investee companies to encourage better disclosure and practices around climate-related risks?

Yes

Please describe

Yes. Each year we ask climate and carbon management questions to about half of the total companies we engage with, which is around 300 annually. Our collaborative and thematic engagements were dominated by climate themes during the last three years (eg. PRI fracking, methane, disclosure groups, plus the investor letter to G20 finance ministers). We also undertake our own individual and collaborative climate engagement projects, such as a CDP utilities report follow-up engagement with 20 companies in collaboration with KLP and other Nordic investors recently and a Swedbank Robur own engagement project on climate issues with Sweden's top 10 scope 1 and 2 emitters.

No, we do not engage

SG 14.10 CC Describe how you use data from climate-related disclosures.

Climate and carbon related information is sourced mostly via our service providers, some via our own company report reading. The information is a component of overall ratings and carbon footprint data communicated to fund managers. Overall carbon and climate performance is factored into company selection for the ethical funds, also used for selecting engagement target companies and for meeting preparation.

SG 15 Mandatory to Report, Voluntary to Disclose Descriptive PRI 1

SG 15.1 Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

Yes
 No

SG 18 Voluntary Descriptive General

SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

SG 18.2 Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

Swedbank Human Fund (Humanfonden) is a charitable fund investing in companies that actively work with environment, human rights and working conditions. The fund is also Nordic Ecolabelled ("Svanen"). Every year, the savers in Human Fund donate 2% of their savings, more than 40 million SEK, for charitable purposes to 74 NGO's. In total over the years we have accumulated more than one billion kronor to these organisations.

No

SG 19 Mandatory Core Assessed PRI 6

SG 19.1 Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Fixed income

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Annually

<http://www.swedbankrobur.se/fonder/rantefonder/>

Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Details on the overall engagement strategy
- Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals
- Number of engagements undertaken
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the progress achieved and outcomes against defined objectives
- Examples of engagement cases
- Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)
- Details on whether the provided information has been externally assured
- Outcomes that have been achieved from the engagement
- Other information

Quarterly or more frequently

<http://www.swedbankrobur.se/fonder/aktiefonder/>
<http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/>

Listed equity - (Proxy) Voting

Do you disclose?	
<input type="radio"/>	We do not disclose to either clients/beneficiaries or the public.
<input type="radio"/>	We disclose to clients/beneficiaries only.
<input checked="" type="radio"/>	We disclose to the public
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/>	Yes
<input type="radio"/>	No

Disclosure to public and URL	
Disclosure to public and URL	
<input type="radio"/>	Explain all voting decisions
<input checked="" type="radio"/>	Explain some voting decisions
<input type="radio"/>	Only explain abstentions and votes against management
<input type="radio"/>	No explanations provided
Ad hoc/when requested	
http://www.swedbankrobur.com/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2221226.pdf http://www.swedbankrobur.com/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_2221232.pdf	

Listed equity - Incorporation

Do you disclose?	
<input type="radio"/>	We do not proactively disclose it to the public and/or clients/beneficiaries
<input type="radio"/>	We disclose to clients/beneficiaries only.
<input checked="" type="radio"/>	We disclose it publicly
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/>	Yes
<input type="radio"/>	No

Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="radio"/>	Broad approach to ESG incorporation
<input type="radio"/>	Detailed explanation of ESG incorporation strategy used
Annually	
http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/ https://www.swedbankrobur.se/om-swedbank-robur/nyhetsbrev/index.htm	

SG 19.2 Additional information [Optional]

Ansvarsfulla Investeringar and quarterly news letters from the sustainable team + corporate governance.

LEI 01	Mandatory	Core Assessed	PRI 1		
LEI 01.1	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%)				
<p> <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 </p> <table border="1" data-bbox="357 371 892 409"> <tr> <td>Percentage of active listed equity to which the strategy is applied</td> <td>100%</td> </tr> </table> <p> <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 </p>				Percentage of active listed equity to which the strategy is applied	100%
Percentage of active listed equity to which the strategy is applied	100%				
LEI 01.2	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, pornography 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 funds. 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.</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 fund 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 02	Voluntary	Additional Assessed	PRI 1
LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.		
<p> <input checked="" type="checkbox"/> Raw ESG company data </p> <ul style="list-style-type: none"> <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 <p> <input checked="" type="checkbox"/> Company-related analysis or ratings </p> <ul style="list-style-type: none"> <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 <p> <input checked="" type="checkbox"/> Sector-related analysis or ratings </p> <ul style="list-style-type: none"> <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 <p> <input type="checkbox"/> Country-related analysis or ratings </p> <p> <input checked="" type="checkbox"/> Screened stock list </p> <ul style="list-style-type: none"> <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 <p> <input checked="" type="checkbox"/> ESG issue-specific analysis or ratings </p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ESG research provider 			

- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager
- Other, specify

LEI 02.2 Provide a brief description of the ESG information used, highlighting any different sources of information across your ESG incorporation strategies.

Our internal sustainability analysts and MSCI ESG Research and Sustainalytics provide proactive sustainability analysis. GES Investment Services provides norm based screening. ISS-Ethix provides norm based screening and sensitive products screening. Trucost provides climate data.

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.

LEI 02.3 Indicate if you incentivise brokers to provide ESG research.

Yes

LEI 02.4 Describe how you incentivise brokers.

Our broker evaluation process include a quantitative ESG component since 2009. It has for the most part been conducted through qualitative feedback on the broker’s services in the sustainability field twice a year. We actively request ESG related information from brokers we have contact with. During 2017 we invited some of them that we consider to have provided the most proactive research, to give us in-depth presentation.

No

LEI 03 Voluntary Additional Assessed PRI 1

LEI 03.1 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 04 Mandatory Descriptive PRI 1

LEI 04.1 Indicate and describe the type of screening you apply to your internally managed active listed equities.

Negative/exclusionary screening

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

Description

At the end of 2017 we had decided on exclusion for 120 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. We also exclude companies which repeatedly violate international norms and show no will to change. (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.

The Watch List is also available in the Pre trade system.

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 is also available to the portfolio

managers.

- 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
Norm-based screening is provided by ISS Ethis and GES International. Evaluation on company basis is performed by in-house ESG analysts and engagement specialists. Companies in high risk sectors with weak sustainability performance and those that are linked to violations of international norm are put on our Watch List and are candidates for our List of Excluded companies. Currently we 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. Portfolio managers are also informed on any changes to the Watch List twice a year.

LEI 04.2	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 05	Mandatory	Core Assessed	PRI 1
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LEI 05.1	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
- Third-party ESG 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
- Review and evaluation of external research providers
- Other, specify
- None of the above

LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.
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- <10%
- 10-50%
- 51-90%
- >90%

LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.
----------	---

- Quarterly or more frequently
- Bi-annually
- Annually
- Less frequently than annually

LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.
----------	--

- Quarterly or more frequently
- Bi-annually
- Annually
- Less frequently than annually

LEI 06	Voluntary	Additional Assessed	PRI 1
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LEI 06.1	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
- Periodic auditing/checking of the organisations RI funds by external party
- Other, specify
- None of the above

LEI 06.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
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Pre-trade checks are done before executing orders in our portfolio maintenance system, to make sure that limits are not breached. Our Department of Investor Risk Control check for limit breaches for every fund daily. The limit calculations are automatically started when the valuation team finish the daily NAV calculations. If limits are breached a report is sent daily by Investor Risk Control to both the Portfolio Manager as well as the Compliance team. Portfolio Managers have to make corrections as soon as possible. Every month a summary report is presented to CEO, deputy- CEO, Head of Investor Risk, Head of Valuation, Head of Product and Head of Equity/Fixed Income/Allocation/Smart Beta.

As per October 2017, five of our funds are certified by the Nordic Eco Label ("Svanen").

LEI 08	Mandatory	Core Assessed	PRI 1
LEI 08.1	Indicate which ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.		
ESG issues	Proportion impacted by analysis		
Environmental	Environmental		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%		
Social	Social		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%		
Corporate Governance	Corporate Governance		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%		

LEI 09	Voluntary	Additional Assessed	PRI 1
LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.		
<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products			
LEI 09.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.		
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%			
<input checked="" type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies			
<input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly.			
LEI 09.3	Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.		
<input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually			
<input checked="" type="checkbox"/> A periodic review of the internal research is carried out			
LEI 09.4	Indicate how frequently you review internal research that builds your ESG integration strategy.		
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually			
<input checked="" type="checkbox"/> Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team			
<input checked="" type="checkbox"/> ESG risk profile of a portfolio against benchmark			
<input type="checkbox"/> Other, specify			
<input type="checkbox"/> None of the above			

LEI 09.5	Describe how ESG information is held and used by your portfolio managers.
<input checked="" type="checkbox"/> ESG information is held within centralised databases or tools and it is accessible by all relevant staff <input type="checkbox"/> ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff <input type="checkbox"/> Systematic records are kept that capture how ESG information and research was incorporated into investment decisions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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LEI 10.1	Indicate which aspects of investment analysis you integrate material ESG information into.		
<input checked="" type="checkbox"/> Economic analysis			
<table border="1"> <tr> <td>Proportion of actively managed listed equity exposed to investment analysis</td> </tr> <tr> <td> <input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90% </td> </tr> </table>		Proportion of actively managed listed equity exposed to investment analysis	<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%
Proportion of actively managed listed equity exposed to investment analysis			
<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%			
<input checked="" type="checkbox"/> Industry analysis			
<table border="1"> <tr> <td>Proportion of actively managed listed equity exposed to investment analysis</td> </tr> <tr> <td> <input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90% </td> </tr> </table>		Proportion of actively managed listed equity exposed to investment analysis	<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%
Proportion of actively managed listed equity exposed to investment analysis			
<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%			
<input checked="" type="checkbox"/> Quality of management			
<table border="1"> <tr> <td>Proportion of actively managed listed equity exposed to investment analysis</td> </tr> <tr> <td> <input type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> 90% </td> </tr> </table>		Proportion of actively managed listed equity exposed to investment analysis	<input type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> 90%
Proportion of actively managed listed equity exposed to investment analysis			
<input type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> 90%			
<input checked="" type="checkbox"/> Analysis of company strategy			
<table border="1"> <tr> <td>Proportion of actively managed listed equity exposed to investment analysis</td> </tr> <tr> <td> <input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90% </td> </tr> </table>		Proportion of actively managed listed equity exposed to investment analysis	<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%
Proportion of actively managed listed equity exposed to investment analysis			
<input checked="" type="radio"/> <10% <input type="radio"/> 11-50% <input type="radio"/> 51-90% <input type="radio"/> 90%			
<input type="checkbox"/> Portfolio weighting <input type="checkbox"/> Fair value/fundamental analysis <input type="checkbox"/> Other, specify			

LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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LEI 11.1	Indicate if you manage passive listed equity funds that incorporate ESG issues in the index construction methodology.		
<input checked="" type="checkbox"/> Yes			
LEI 11.2	Indicate the percentage of your total passive listed equity funds for which ESG issues are incorporated in the index construction methodology.		
<table border="1"> <tr> <td>(% of total passive listed equity funds)</td> </tr> <tr> <td> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90% </td> </tr> </table>		(% of total passive listed equity funds)	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
(% of total passive listed equity funds)			
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%			
LEI 11.3	Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategies you apply.		
<input checked="" type="checkbox"/> Index/fund 1			
<table border="1"> <tr> <td>Index/fund name and brief description of ESG methodology</td> <td>ESG incorporation strategy</td> </tr> </table>		Index/fund name and brief description of ESG methodology	ESG incorporation strategy
Index/fund name and brief description of ESG methodology	ESG incorporation strategy		

Our Access funds (close to index funds) do not invest in:

- controversial weapons, such as cluster munition, anti-personnel mines and nuclear weapons, as well as coal production (representing more than 30 percent of total business revenue).
- manufacturing or distribution of weapons (0%)
- manufacturing and/or sale of military equipment (more than 5% of total sales).
- production and/or sale of tobacco equipment (more than 5% of total sales).
- production and/or sale of alcohol equipment (more than 5% of total sales).
- companies that produce pornographic material (0 %) and/or have more than 5% or more than a marginal part of their activities in the distribution of pornographic material.
- Companies associated to violations of international norms regarding the protection of people and the environment (based on international conventions from the UN, ILO and OECD amongst others. The principles reflect the UN Global Compact's principles for responsible business as well as the OECD Guidelines for Multinational Enterprises. Accordingly, the norms analysis covers: human rights and labour rights; the environment; business ethics and corruption; weapons.

- Screening
- Thematic
- Integration of ESG issues
- Other

- Index/fund 2
 - Index/fund 3
 - Index/fund 4
 - Index/fund 5
- No

LEI 12	Voluntary	Descriptive	PRI 1
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LEI 12.1 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 2017 we had decided on exclusion for 120 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.).

The Watch List is also available to the fund managers in the pre trade system.

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

- Index incorporating ESG issues (for passively managed funds)

LEI 13	Voluntary	Additional Assessed	PRI 1
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LEI 13.1 Indicate whether your organisation measures how your approach to responsible investment in Listed Equity has affected your portfolio's financial and/or ESG performance.

- We measure whether our approach to ESG issues impacts funds' reputation
- We measure whether our approach to ESG issues impacts funds' financial performance: return
- We measure whether our approach to ESG issues impacts funds' financial performance: risk
- We measure whether our approach to ESG issues impacts funds' ESG performance

Describe the impact on:	Describe the impact	Which strategies were analysed?
Funds' ESG performance	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Index construction (passive funds)

- None of the above

LEI 13.2 Describe how you are able to determine these outcomes.

In 2016 Morningstar launched the Morningstar Sustainability Rating™ which measure of how well the holdings in a portfolio are managing their environmental, social, and governance, or ESG, risks and opportunities. The fund managers receive information regarding the sustainability score and Morningstar globes every month.

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	Attach or provide a URL to your engagement policy.		
<input type="checkbox"/> Attachment provided: <input checked="" type="checkbox"/> URL provided: http://www.swedbankrobur.se/idc/groups/public/@i/@sc/@all/@robur/documents/article/cid_1818318.pdf			
LEA 01.3	Indicate what your engagement policy covers:		
<input checked="" type="checkbox"/> Conflicts of interest <input type="checkbox"/> Insider information <input type="checkbox"/> Alignment with national stewardship code requirements <input type="checkbox"/> Due diligence and monitoring process <input checked="" type="checkbox"/> Prioritisation of engagements <input checked="" type="checkbox"/> Transparency of engagement activities <input checked="" type="checkbox"/> Environmental factors <input checked="" type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
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 had an official ownership policy incorporating ESG aspects. In 2015 we complemented this with the creation of a more detailed, stand alone "Policy for Responsible Investments". 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 checked="" type="checkbox"/> Other, specify <p style="margin-left: 20px;">To gather information for analytical purposes.</p> <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 checked="" type="checkbox"/> Other, specify <p style="margin-left: 20px;">To gather information for analytical purposes.</p> <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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LEA 02.2	Additional information. [Optional]										
<p>During 2017, of the companies that we engaged with on sustainability issues (ES):</p> <p>54 % we contacted ourselves</p> <p>21 % was through collaborative engagements</p> <p>25 % 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 <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 that have already occurred. <input checked="" type="checkbox"/> As a response to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (i.e. NGOs, trade unions etc.) <input checked="" type="checkbox"/> As a follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Other, describe	
<input type="radio"/> 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
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LEA 04.1	Indicate if you define specific objectives for your engagement activities.
<input checked="" type="radio"/> Yes <ul style="list-style-type: none"> <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 by internal staff.	

LEA 04.2	Indicate if you monitor the actions that companies take during and following your engagements activities carried out by internal staff.
<input checked="" type="radio"/> Yes <ul style="list-style-type: none"> <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 by internal staff.	

LEA 04.3	Indicate if you do any of the following to monitor and evaluate the progress of your engagement activities carried out by internal staff.
<input checked="" type="checkbox"/> Define timelines for your objectives <input checked="" type="checkbox"/> Tracking and/or monitoring progress against defined objectives <input checked="" type="checkbox"/> Tracking and or monitoring progress of actions taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on continuous basis <input type="checkbox"/> Other, please specify <input type="checkbox"/> We do not monitor and evaluate progress of engagement activities carried out by internal staff	

LEA 04.4	Additional information. [Optional]
<p>A plan for engagement is set each year. It is updated and evaluated quarterly. Bi-weekly group meetings are held to discuss both individual engagement cases and overall progress against our own high-level goals.</p>	

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 by the collaboration <input checked="" type="checkbox"/> Materiality of ESG factors addressed by the collaboration	

- Systemic risks to global portfolios addressed by the collaboration
- Exposure (holdings) to companies targeted by the collaboration
- In reaction to ESG impacts addressed by the collaboration that have already occurred.
- As a response to divestment pressure
- As a follow-up from a voting decision
- Consultation with clients/beneficiaries
- Consultation with other stakeholders (i.e. NGOs, trade unions etc.)
- Other, describe

No

LEA 05.3 Additional information [Optional]

In 2017, of the companies that we engaged with on sustainability issues (ES), 21 % was through collaborative engagements.

LEA 06 Mandatory Core Assessed PRI 2

LEA 06.1 Indicate if you define specific objectives for your engagement activities carried out collaboratively.

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

LEA 06.2 Indicate if you monitor the actions companies take during and following your collaborative engagements.

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

LEA 06.3 Indicate if you do any of the following to monitor and evaluate the progress of your collaborative engagement activities.

- Define timelines for your objectives
- Tracking and/or monitoring progress against defined objectives
- Tracking and or monitoring progress of actions taken when original objectives are not met
- Revisit and, if necessary, revise objectives on continuous basis
- Other, please specify
- We do not monitor and evaluate progress of engagement activities carried out by internal staff

LEA 06.4 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 climate/carbon related issues. PRI Clearinghouse is one important platform for our collaborative engagements. We also regularly engage with European and Swedish companies on our own initiative collaboratively with other Nordic 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

LEA 07.1 Indicate if you play a role in the engagement process that your service provider conducts on your behalf.

Yes

LEA 07.2 Indicate the role(s) you play in engagements that your service provider conducts on your behalf.

- Discuss the topic (or ESG issue(s)) of engagement
- Discuss the rationale for engagement
- Discuss the objectives of the engagement
- Select the companies to be engaged with
- Discuss the frequency/intensity of interactions with companies
- Discuss next steps for engagement activity
- Participate directly in certain engagements with your service provider
- Other, specify
- We play no role in engagements that our service provider conducts.

No

LEA 07.3 Additional information. [Optional]

During 2017, of the companies that we engaged with on sustainability issues (ES) 25 % was through our service providers.

LEA 08	Mandatory	Core Assessed	PRI 2,6
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LEA 08.1	Do you monitor and review the outcomes of the engagement activities undertaken by your service providers on your behalf?
<input checked="" type="checkbox"/> Yes, periodically <input type="checkbox"/> Yes, ad hoc basis <input type="checkbox"/> We do not monitor or review them	

LEA 08.2	Additional information. [Optional]
<p>Companies engaged with by our service provider are chosen primarily on the basis of their potential involvement in ESG norms breaches. The list of companies to be engaged with is determined quarterly, with company responses and progress being carefully evaluated on an ongoing basis. We meet biannually with our service provide to evaluate this work.</p>	

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.
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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]
<p>Through at least bi-annual tailor made meetings and also through information in ESG-databases that the portfolio managers have access to. During 2017 we measured the carbon footprint of all equity-funds and close-to-index-funds twice. We also distributed monthly reports on the sustainability scores and rankings of the funds according to Morningstar.</p>	

LEA 10	Mandatory	Gateway	PRI 2
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LEA 10.1	Indicate if you track the number of your engagement activities.
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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 10.2	Additional information. [OPTIONAL]
<p>Engagement meetings are logged as they occur, and progress on the engagements is evaluated and reported on quarterly internally and annually externally. The engagements are goal based, and company responsiveness and progress are monitored using our own-developed guidelines for engagements conducted internally. The annual reporting of our engagement activity includes information on both quantifiable KPI's and qualitative outcomes by way of case-studies. Please refer to annual report: http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/</p>	

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.
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	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	169	5Proportion (to the nearest 5%)	<input type="radio"/> of the total number of companies you hold <input checked="" type="radio"/> of the total value of your listed equity holdings
Collaborative engagements	67	5Proportion (to the nearest 5%)	<input type="radio"/> of the total number of companies you hold <input checked="" type="radio"/> of the total value of your listed equity holdings
Service provider engagements	73	5Proportion (to the nearest 5%)	<input type="radio"/> of the total number of companies you hold <input checked="" type="radio"/> 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="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None
Collaborative engagements	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None
Service provider engagements	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 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
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 had some involvement in during the reporting year.

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

LEA 11.5 Additional information. [Optional]

Swedbank Robur conducts engagement in a structured way with target companies identified in Q1 each year. Engagement is conducted under the categories large owner, theme, norms, stakeholder dialogue, analysis dialogue, controversial products, and incidents. We are the second largest owner on the Swedish stock exchange so much of our effort focuses on these companies, where our clients are also located, and where we have considerable influence. In this market Swedbank Robur's own ESG analysts engaged with 61% of the value of our equity holdings during 2017. The Swedish market is however small in global terms, so our global average was 15% of the value of our equity holdings. It should also be noted that we engage with a considerable number of companies which we don't own, and these figures do not show in the above calculations.

The main aim of our engagement effort is to achieve positive company change. This is achieved by carefully balancing engagement quantity (number of contacted companies measured above), with quality and intensity. The latter requires considerably more time but is highly important. It is also more difficult to quantify, however we have developed metrics to do this. Many of our engagements from during 2017 involved multiple contacts and exchanges with some companies. We monitor the quality and intensity of dialogue quarterly and place the highest value on meetings (which include phone and video conversations and face-to-face meetings). On this metric we achieved a rate of 46% during 2017 globally.

LEA 12	Voluntary	Additional Assessed	PRI 2
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LEA 12.1 Indicate which of the following your engagement involved.

- Letters and emails to companies
 - 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
- Participation in roadshows
- Other, specify
ESG research

LEA 12.2 Additional information. [Optional]

Swedbank Robur conducts engagement in a structured way with target companies identified in Q1 each year. Engagement is conducted under the categories large owner, theme, norms, stakeholder dialogue, analysis dialogue, controversial products, and incidents. We are the second largest owner on the Swedish stock exchange so much of our effort focuses on Swedish companies, where our clients are also located, and where we have considerable influence. In this market Swedbank Robur's own ESG analysts engaged with 61% of the value of our equity holdings during 2017. The Swedish market is however small in global terms, so our global average was only 6% of the value of our equity holdings. It should also be noted that we engage with a considerable number of companies which we don't own, and these figures do not show in the above calculations.

The main aim of our engagement effort is to achieve positive company change. This is achieved by carefully balancing engagement quantity (number of contacted companies measured above), with quality and intensity. The latter requires considerably more time but is highly important. It is also more difficult to quantify, however we have developed metrics to do this. Many of our engagements from during 2017 involved multiple contacts and exchanges with some companies. We monitor the quality and intensity of dialogue quarterly and place the highest value on meetings (which include phone and video conversations and face-to-face meetings). On this metric our own analyst staff achieved a rate of 46% during 2017 globally.

During 2017 we undertook a number of site visits, including to number of Swedish manufacturing facilities, as well as Brazil to discuss Samarco and the Petrobras scandal, and an ESG study of Nordic paper and forestry company operations.

LEA 13	Voluntary	Descriptive	PRI 2
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LEA 13.1 Indicate whether you track the number of cases during the reporting year in which 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

Do you track number of companies that changed or made a formal commitment to change in the reporting year following your organisation's and/or your service provider's engagement activities?

Yes, we do track information

LEA 13.2 Indicate the number of companies that changed or made a formal commitment to change in the reporting year following your organisation's and/or your service provider's engagement activities.

	Number of companies	% of total portfolio
Individual / Internal staff engagements		
Collaborative engagements		
Service provider engagements		

We do not track this information

No

LEA 13.3 Additional information [Optional].

All of our supplier and collaborative engagements are goal based. Engagement conducted by Swedbank Robur's own analysts is also goal based where it relates to our own themes, company incidents and norms breaches – the latter two comprise the companies on our Watch List. The watch list also has a number of CCC rated companies from high risk branches.

(the remaining engagement is primarily for research purposes so is not goal based, however it does have influence, as it highlights important investor issues for companies)

Progress and outcomes on the watch list, collaborative and supplier dialogues are also monitored. There is considerable overlap between our supplier's norms

based dialogue and our own watch list.

For our watch list we measure company responsiveness and progress on a seven step scale, whereby those at step seven have achieved all of the set objectives. During 2017 Swedbank Robur and suppliers engaged with 49 of our watch listed companies. Around 36% did not respond, mainly due to language and cultural differences. Of those that did respond, around 34% had begun to implement improvements and 6% had achieved all of their goals.

A summary of our engagement results can be found in our annual report. <http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/>

LEA 14	Voluntary	Additional Assessed	PRI 2
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LEA 14.1 Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.

Add Example 1

ESG factors	Multiple
ESG issue	ESG- health, safety and environment
Conducted by	Individual / Internal
Objectives	Transocean- Our goals for Transocean involved HSE management system improvements following the Macondo incident in the Gulf of Mexico, which needed to be implemented across the company's global operations, not just in the USA as stipulated by US authorities.
Scope and Process	Transocean has been on Swedbank Roburs watch list for a number of years following involvement in major incidents in 2010.
Outcomes	The company has implemented these improvements and has operated for several years now without serious incident. Moreover, Transocean will publish its first sustainability report for 2017.

Add Example 2

ESG factors	Multiple
ESG issue	ESG- health, safety and labour right
Conducted by	Individual / Internal
Objectives	Our goals for Lonmin following the Marikana massacre in 2012 revolved around ensuring full cooperation with the Marikana Commission of Inquiry, compensation of impacted families and implementing the Voluntary Principles on Security and Human Rights (VPs) branch initiative
Scope and Process	Lonmin has been on Swedbank Roburs watch list for a number of years following involvement in major incidents in 2012.
Outcomes	The company has now achieved these goals with the appointment of new Head of Sustainability, establishment of a Human Rights Working Group and alignment to the VPs.

Add Example 3

ESG factors	Environment
ESG issue	Climate issues in the energy sector
Conducted by	Collaborative
Objectives	In 2017, Swedbank Robur launched a collaborative project with a group of Nordic investors, among others KLP from Norway, addressing European energy companies. The purpose with the dialogue was to find out what preparedness the companies has to meet the climate requirements required under the Paris agreement. The companies were selected based on the results from the latest energy sector report compiled by the Carbon Disclosure Project (CDP), which shows that a conversion is urgent. The CDP's assessment shows that that the current energy mix in production likely to exceed the Paris Agreement's bilateral targets by about 14 percent.
Scope and Process	The Investors Group put together a detailed follow up questionnaire focusing on the areas identified in the report to have major shortcomings or potential for development. The questionnaire was then sent to the 20 selected companies. The questions concerned, among other things, the assessment of emissions from existing plants, water impact, emission reduction targets, target for renewable energy and effects of investment strategies.
Outcomes	By the end of the year, most responses had been received. These will be analyzed and followed up in 2018.

Add Example 4

- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

LEA 14.2 Additional information. [Optional]

For more examples we refer to our annual report: <http://www.swedbankrobur.se/om-swedbank-robur/sa-jobbar-vi-med-ansvarsfulla-investeringar/>

LEA 15 Mandatory Core Assessed PRI 1,2,3

LEA 15.1 Indicate whether your organisation has a formal voting policy.

Yes

LEA 15.2 Indicate what your voting policy covers:

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

LEA 15.3 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 15.4 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 336 general meetings where of 141 in companies listed outside of Sweden and co-filed approximately 1100 resolutions as part of nomination committees in 81 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, Australia, Japan and Taiwan.

No

LEA 16 Mandatory Descriptive PRI 2

LEA 16.1 Indicate how you typically make your (proxy) voting decisions.

Approach

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

Based on

- our own voting policy
- our clients' requests or policy
- other, explain

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

LEA 16.2 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.

LEA 16.3	Additional information.[Optional]		
<p>For companies listed in Sweden, we make our own decisions based on our own research without the use of service providers.</p> <p>For companies listed outside of Sweden, we make our own decisions based on our own research as well as research and recommendations from a service provider.</p>			
LEA 18	Voluntary	Descriptive	PRI 2
LEA 18.1	Describe your involvement in any projects to improve the voting trail and/or to obtain vote confirmation .		
<p>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.</p>			
LEA 19	Voluntary	Additional Assessed	PRI 2
LEA 19.1	Indicate if your organisation has a securities lending programme.		
<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>			
LEA 19.2	Describe why your organisation does not lend securities?		
<p>Our investment philosophy is to add value as an active long term owner. We do not have a security lending program and have not had for a long time. It is a business decision, including transparency issues and ESG- considerations.</p>			
LEA 19.4	Additional information.		
<p>Our ownership policy states that: in case of an equity securities lending program, the equities are recalled in advanced of the General Meeting.</p>			
LEA 20	Mandatory	Core Assessed	PRI 2
LEA 20.1	Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting		
<p><input type="radio"/> Yes, in most cases</p> <p><input checked="" type="radio"/> Sometimes, in the following cases:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Votes for selected markets <input type="checkbox"/> Votes relating to certain ESG issues <input checked="" type="checkbox"/> Votes for significant shareholdings <input checked="" type="checkbox"/> Votes for companies we are engaging with <input type="checkbox"/> On request by clients <input type="checkbox"/> Other <p><input type="radio"/> Neither we nor our service provider raise concerns with companies ahead of voting</p>			
LEA 20.2	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.		
<p><input checked="" type="radio"/> Yes, in most cases</p> <p><input type="radio"/> Sometimes, in the following cases.</p> <p><input type="radio"/> We do not communicate the rationale to companies</p> <p><input type="radio"/> Not applicable because we and/or our service providers do not abstain or vote against management recommendations</p>			
LEA 20.3	Additional information. [Optional]		
<p>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 when we meet the company.</p>			
LEA 21	Mandatory	Core Assessed	PRI 2
LEA 21.1	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.		
<p><input checked="" type="checkbox"/> We do track or collect this information</p>			
		Votes cast (to the nearest 1%)	
		73%	
		Specify the basis on which this percentage is calculated	
<p><input type="radio"/> of the total number of ballot items on which you could have issued instructions</p> <p><input type="radio"/> of the total number of company meetings at which you could have voted</p> <p><input checked="" type="radio"/> of the total value of your listed equity holdings on which you could have voted</p>			
LEA 21.2	Explain your reason(s) for not voting certain holdings		
<p><input checked="" type="checkbox"/> Shares were blocked</p> <p><input checked="" type="checkbox"/> Notice, ballots or materials not received in time</p> <p><input type="checkbox"/> Missed deadline</p> <p><input checked="" type="checkbox"/> Geographical restrictions (non-home market)</p>			

- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- On request by clients
- Other

We do not track or collect this information

LEA 22	Mandatory	Additional Assessed	PRI 2
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LEA 22.1 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 22.2 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	83%
Against (opposing) management recommendations	14%
Abstentions	3%

LEA 22.3 Describe the actions you take in relation to voting against management recommendations.

If our funds are a large shareholder we normally inform in advance. Otherwise, depending on the issues we often inform the company at later contacts.

No, we do not track this information

LEA 22.4 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 9 general meetings in companies listed in Sweden of 195 (5%) we did vote AGAINST at least one resolution.

In 105 general meetings in companies listed outside of Sweden of 141 (74%) we did vote AGAINST at least one resolution.

LEA 23	Voluntary	Descriptive	PRI 2
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LEA 23.1 Indicate if your organisation directly or via a service provider filed or co-filed any ESG shareholder resolutions during the reporting year.

Yes

LEA 23.2 Indicate the number of ESG shareholder resolutions you filed or co-filed.

1100

LEA 23.3 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 23.4 Of the ESG shareholder resolutions that you filed or co-filed and that were put to vote (i.e. not withdrawn) how many received:

1100

LEA 23.5 Describe the ESG shareholder resolutions that you filed or co-filed and the outcomes achieved.

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 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.

Specification to 23.2

Number of joint resolutions approximately 1100 all in Sweden.

81 Nomination Committees (with members normally appointed by the 3-6 largest shareholders) filed resolutions for:

81 Chair of the AGM - All approved

81 Numbers of directors on the board - All approved

558 Directors (where of approximately 17% newly elected) - All approved

81 Chair of the Board - All approved

81 Remuneration for the board and board committees - All approved

76 Auditors (approximately, some have still mandates longer than 1 year) - All approved

81 Remuneration for the auditors - All approved

57 Principles (approximately, some have mandates longer than 1 year) - All approved

No

LEA 23.6	Describe whether your organisation reviews ESG shareholder resolutions filed by other investors.
Yes we review all proposals in companies where we have decided to vote at the general meetings. In addition, in a selected number of companies we monitor if there are ESG shareholder resolutions that we will support.	

LEA 24	Voluntary	Descriptive	PRI 2
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LEA 24.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.
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Add Example 1

ESG Factors	<input type="checkbox"/> Environment <input type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
ESG issue	Share issue of a new share class with lower voting rights
Conducted by	Individual/Internal
Objectives	Swedbank Robur opposed the proposal and advocated for it to be withdrawn.
Scope and Process	At an extra general meeting the board of Corem Property Group proposed a share issue of a new share class with lower voting rights. The new issue was technically treating all existing shareholders the same, but in its set up was not in the interest of all shareholders. Swedbank Robur, together with several other institutional investors, opposed the proposal and voted against it.
Outcomes	Swedbank Robur voted against the proposal but it was accepted due to the majority shareholder support.

Add Example 2

ESG Factors	<input type="checkbox"/> Environment <input type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
ESG issue	Remuneration reports and LTIP
Conducted by	Individual/Internal
Objectives	Swedbank Robur's voting policy states the importance of performance criteria as well as improved transparency regarding performance criteria with regards to remuneration reports and LTIP.
Scope and Process	Swedbank Robur voted against approval of advisory votes for remuneration reports as well as against long term incentive programs in companies when there was a lack of performance criteria for grant or where the performance criteria were low and/or the programs were assessed to be too generous.
Outcomes	Remuneration reports and programs we voted against in 2017 include most US companies as well as ABB, Nestle, Novartis, AstraZeneca and Lucara Diamond.

Add Example 3

ESG Factors	<input checked="" type="checkbox"/> Environment <input type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
ESG issue	Shareholder proposals
Conducted by	Individual/Internal
Objectives	Swedbank Robur votes in favor of shareholder resolutions, which we assess are in line with shareholder interests.
Scope and Process	Swedbank Robur assessed shareholder resolutions proposing increased climate reporting. Swedbank Robur also assessed shareholder resolutions regarding increased transparency for lobbying and political donations and proposals for increased reporting regarding false news.

Outcomes	Specifically we have, in 2017, voted in favor of shareholder resolutions proposing increased climate reporting including companies like Occidental Petroleum and Exxon Mobile, increased transparency regarding lobbying and political donations including companies like UnitedHealth Group, Walt Disney Company and Cisco System and voted for increased reporting regarding false news in Facebook and Alphabet.
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- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

FI 01.1 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 01.2 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 the beginning of 2017 we have been working to apply a more thorough process for integration of ESG-analysis into the investment process. For example, companies with poor ESG performance have been excluded.

FI 02.1 Indicate which ESG factors you systematically research as part of your analysis on issuers.

	Corporate (financial)	Corporate (non-financial)
Environmental data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Governance data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

FI 02.2 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 02.3 Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

The source of the ESG information used is sell-side, inhouse ESG- specialists and the work of in-house PMs. We receive tailored ESG-data for the Fixed Income Universe.

FI 03 **Mandatory** **Additional Assessed** **PRI 1**

FI 03.1 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 03.2 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 04 **Mandatory** **Gateway** **PRI 1**

FI 04.1 Indicate the type of screening you conduct.

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

FI 04.2 Describe your approach to screening for internally managed active fixed income

Fixed income do not invest in companies that develop, manufacture or sell cluster munitions, anti-personnel mines, chemical and biological weapons and nuclear weapons. Also, fixed income do not invest in companies that produce pornographic material or that produce coal amounting to 30 % or more of its turnover .

FI 05 **Mandatory** **Descriptive** **PRI 1**

FI 05.1 Indicate why you conduct negative screening.

- Corporate (fin)**
 - For legal reasons
 - For non-legal reasons
- Corporate (non-fin)**
 - For legal reasons
 - For non-legal reasons

FI 05.2 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 06	Voluntary	Additional Assessed	PRI 1
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FI 06.1 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 checked="" type="checkbox"/>	Environmental
<input checked="" 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	
Thales excluded in all of our funds, due to nuclear weapons production .	

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 checked="" 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	
Airbus excluded in all of our funds, due to nuclear weapons production	

Example 3

Type of fixed income	
<input type="checkbox"/>	Corporate (financial)
<input checked="" type="checkbox"/>	Corporate (non-financial)
ESG factors	
<input checked="" type="checkbox"/>	Environmental
<input checked="" 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	
Sagax is excluded in our Ethica funds due to insufficient ESG work.	

Example 4

Type of fixed income	
<input type="checkbox"/>	Corporate (financial)
<input checked="" type="checkbox"/>	Corporate (non-financial)
ESG factors	
<input type="checkbox"/>	Environmental
<input checked="" 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	
Deutsche Telecom- verified failure to respect union rights. The company was excluded in all the fixed income credit funds.	

Example 5

Type of fixed income	
<input checked="" type="checkbox"/>	Corporate (financial)
<input checked="" type="checkbox"/>	Corporate (non-financial)
ESG factors	
<input type="checkbox"/>	Environmental
<input checked="" 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	
Dongfeng Motor- failure to meet human rights. The company was excluded in all the fixed income credit funds.	

FI 07	Mandatory	Core Assessed	PRI 1
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FI 07.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
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Type of screening	Checks
Negative/exclusionary screening?	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years. <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

FI 15	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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FI 15.1	Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.
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Category	Proportion of assets

Corporate (financial)	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="checkbox"/> More than 0%, less than 5%
	FI 15.2 Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)
	<input type="radio"/> To gain insights into ESG (i.e. enhance disclosure) <input checked="" type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity) <input type="radio"/> Other, specify <input type="radio"/> None of the above
Corporate (non-financial)	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="checkbox"/> More than 0%, less than 5%
	FI 15.2 Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)
	<input type="radio"/> To gain insights into ESG (i.e. enhance disclosure) <input checked="" type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity) <input type="radio"/> Other, specify <input type="radio"/> None of the above

FI 15.3 Additional information.[OPTIONAL]

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 16.1 Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Type of engagement	Corporate (financial)	Corporate (non-financial)
Individual/Internal staff engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Collaborative engagements	<input type="checkbox"/>	<input type="checkbox"/>
Service provider engagements	<input type="checkbox"/>	<input type="checkbox"/>

FI 16.2 Indicate how your organisation prioritises engagements with issuers

	Corporate (financial)	Corporate (non-financial)
Based on potential materiality of ESG factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Based on systemic risks (e.g. low-carbon transition) to global portfolios	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Based on our exposure (holdings)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

FI 16.3 Indicate when your organisation conducts engagements with issuers.

	Corporate (financial)	Corporate (non-financial)
Engagements are conducted pre-investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Engagements are conducted post-investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>

FI 16.4 Indicate how your organisation conducts engagements with issuers.

	Corporate (financial)	Corporate (non-financial)
We systematically engage prior to ESG-related divestments	<input type="checkbox"/>	<input type="checkbox"/>
We engage proactively in anticipation of specific ESG risks and/or opportunities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage in reaction to ESG issues which have already affected the issuer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Investment and ESG analysts systematically conduct ESG-related engagements together	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>

FI 16.5 Indicate what your organisation conducts engagements with issuers on.

	Corporate (financial)	Corporate (non-financial)
We conduct engagements with individual issuers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We conduct engagements within sectors and industries.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We conduct engagements on specific ESG themes (e.g. human rights)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>

FI 16.6 Indicate how your organisation shares the outcomes of the engagements internally.

	Corporate (financial)	Corporate (non-financial)
We have a systematic process to ensure the outcomes of engagements are made available	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We occasionally make the outcomes of engagements available	<input type="checkbox"/>	<input type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>
We do not make this information available	<input type="checkbox"/>	<input type="checkbox"/>
We do not share the outcomes of the engagements internally	<input type="checkbox"/>	<input type="checkbox"/>

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 17.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

- Yes
- No

FI 18 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 18.1 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"/>	<input type="checkbox"/>
We measure whether incorporating ESG impacts financial returns	<input type="checkbox"/>	<input type="checkbox"/>
We measure whether incorporating ESG impacts risk	<input type="checkbox"/>	<input type="checkbox"/>
We measure whether incorporating ESG impacts funds' ESG performance	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

FI 19 Voluntary Descriptive PRI 1,2

FI 19.1 Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.

Example 1

Corporate (non-financial)	
ESG issue and explanation	Sagax (real estate firm)- During the fall of 2017 we engaged with Sagax to discuss how to improve their ESG work as well as reporting standards.
Engagement	
Impact on investment decision or performance	The Ethica funds cannot invest in Sagax their ESG work is not strong enough.

Example 2

Corporate (non-financial)	
ESG issue and explanation	Akelius (real estate firm)- During the fall of 2017 we engaged with Akelius to discuss their overall ESG approach, existing contractors and suppliers as well as health & safety.
Engagement	

Impact on investment decision or performance
The Ethica funds cannot invest in Akelius as their ESG work is not strong enough.

Example 3

Corporate (non-financial)	
ESG issue and explanation	Volkswagen- During the fall of 2017 we discussed governance, human rights and Co2.
Engagement	
Impact on investment decision or performance	The Ethica funds can not invest in Volkswagen as their ESG work is not strong enough. For the rest of Swedbank Robur portfolios the answers we got were sufficient for us to stay invested.

Example 4

Example 5

CM1 01.1	Mandatory	Core Assessed	General							
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:									
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input type="radio"/> Whole PRI Transparency Report has been internally verified <input checked="" type="radio"/> Selected data has been internally verified <input checked="" type="checkbox"/> Other, specify Internal verification of Head of Sustainability. Part of the externally reported information has been audited by Deloitte.										
CM1 01.2 & 01.8	Mandatory	Descriptive	Planned assurance of this year's PRI Transparency Report							
CM1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?									
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="checkbox"/> We do not plan to assure this year's PRI Transparency report										
CM1 01.3 & 01.9	Mandatory	Descriptive	General							
CM1 01.3	We undertook third party assurance on last year's PRI Transparency Report									
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="checkbox"/> We did not assure last year's PRI Transparency report, or we did not have such a report last year.										
CM1 01.4, 10:12	Mandatory	Descriptive	General							
CM1 01.4	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:									
<input checked="" type="checkbox"/> We adhere to an RI certification or labelling scheme										
CM1 01.10	Which scheme?									
<input type="checkbox"/> National SRI label based on the EUROSIF Transparency guidelines <input type="checkbox"/> B-corporation <input type="checkbox"/> UK Stewardship code <input type="checkbox"/> GRESB <input type="checkbox"/> Commodity type label (e.g. BCI) <input type="checkbox"/> Social label <input checked="" type="checkbox"/> Climate label <table border="1" style="margin-left: 20px;"> <tr> <td>Specify</td> </tr> <tr> <td>Montreal Carbon Pledge</td> </tr> </table> <table border="1" style="margin-left: 20px;"> <tr> <td>% of total AUM the scheme applies</td> </tr> <tr> <td><input type="radio"/> < 25%</td> </tr> <tr> <td><input type="radio"/> 25-50 %</td> </tr> <tr> <td><input checked="" type="radio"/> 50-70 %</td> </tr> <tr> <td><input type="radio"/> >75 %</td> </tr> </table> <input type="checkbox"/> RIAA <input type="checkbox"/> Other				Specify	Montreal Carbon Pledge	% of total AUM the scheme applies	<input type="radio"/> < 25%	<input type="radio"/> 25-50 %	<input checked="" type="radio"/> 50-70 %	<input type="radio"/> >75 %
Specify										
Montreal Carbon Pledge										
% of total AUM the scheme applies										
<input type="radio"/> < 25%										
<input type="radio"/> 25-50 %										
<input checked="" type="radio"/> 50-70 %										
<input type="radio"/> >75 %										
<input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input checked="" type="checkbox"/> Other, specify Intertek has audited part of our processes which are certified according to ISO 14001.										
<input type="checkbox"/> None of the above										

CM1 01.7 Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report , and if this applies to selected data please specify what data was reviewed

CEO or other Chief-Level staff

Sign-off or review of responses

- Sign-off
- Review of responses

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

Organisational Overview

Corresponding Indicator number
most

Strategy and Governance

Corresponding Indicator number
SG 07.2

Direct - Listed Equity Incorporation

Direct - Listed Equity Active Ownership

Corresponding Indicator number
LEA 01.4

Direct - Fixed Income

Corresponding Indicator number
FI 01.2

- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

Organisational Overview

Strategy and Governance

Corresponding Indicator number
all

Direct - Listed Equity Incorporation

Corresponding Indicator number
all

Direct - Listed Equity Active Ownership

Corresponding Indicator number
all

Direct - Fixed Income

Corresponding Indicator number

- all
- Investment Teams
- Legal Department
- Other (specify)