

2026
**Operating Principles of
Impact Management**

Nordea Asset Management Disclosure Statement

March 2026

Table of Content

Disclosure Statement	3
■ Principle 1 – Define strategic impact objective(s)	4
■ Principle 2 – Manage strategic impact on a portfolio basis	6
■ Principle 3 – Establish the Manager’s contribution to the achievement of impact	7
■ Principle 4 – Assess the expected impact of each investment	9
■ Principle 5 – Assess, address, monitor and manage potential negative impacts	11
■ Principle 6 – Monitor the progress of each investment	13
■ Principle 7 – Conduct exits considering the effect on sustained impact	14
■ Principle 8 – Review, document and improve decisions and processes	15
■ Principle 9 – Publicly disclose alignment with the Impact Principles	16

Disclosure Statement

Nordea Asset Management (the “Signatory”) hereby affirms its status as a Signatory of the Operating Principles of Impact Management (the “Impact Principles”).

Nordea Asset Management’s (NAM) responsible investment journey spans over three and a half decades, commencing with the launch of our first sector-screened fund. Being of Nordic origin, sustainability and responsible investment are deeply embedded in our corporate culture, philosophy and business model. We recognize our fiduciary duty to consider all material factors affecting our clients’ investments, including non-financial elements such as ESG criteria. NAM was an early signatory to the UN Principles for Responsible Investment in 2007, demonstrating our proactive stance in this field and, for more than 17 years, we have continuously refined our comprehensive Responsible Investment framework to adapt to evolving market dynamics and client needs.

Impact investing represents a natural progression in our commitment to ESG principles and alignment with the UN Sustainable Development Goals. NAM adheres to GIIN’s definition¹ that impact investments are made with the intention to generate positive, measurable social and/or environmental outcomes alongside a financial returns.

In practice, NAM considers “impact” as the positive long-term effect an organization has on the economy, the environment and/or society. NAM distinguishes between “investor impact” – which describes the positive change created in a portfolio company by the investment activity (e.g. capital allocation and active ownership) – and “enterprise impact” – referring to the positive benefits delivered by a company’s products or services to its stakeholders and the broader community.

This Disclosure Statement applies to the following assets under business lines (the “Covered Assets”):

- **Nordea Global Impact Strategy**

The total Covered Assets in alignment with the Impact Principles is EUR 470 million² as of January 31, 2026.

1) GIIN, January 24, 2025, “What you need to know about impact investing”. 2) The equivalent to USD 559m.

1

Principle 1

Define strategic impact objective(s), consistent with the investment strategy

The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.

The Nordea Global Impact Strategy has established a robust framework for defining and pursuing strategic impact objectives. Our approach is rooted in addressing critical global challenges that our team has identified, drawing upon the United Nations Sustainable Development Goals (SDGs). We have a specific focus on areas where private sector companies can provide scalable, market-based solutions.

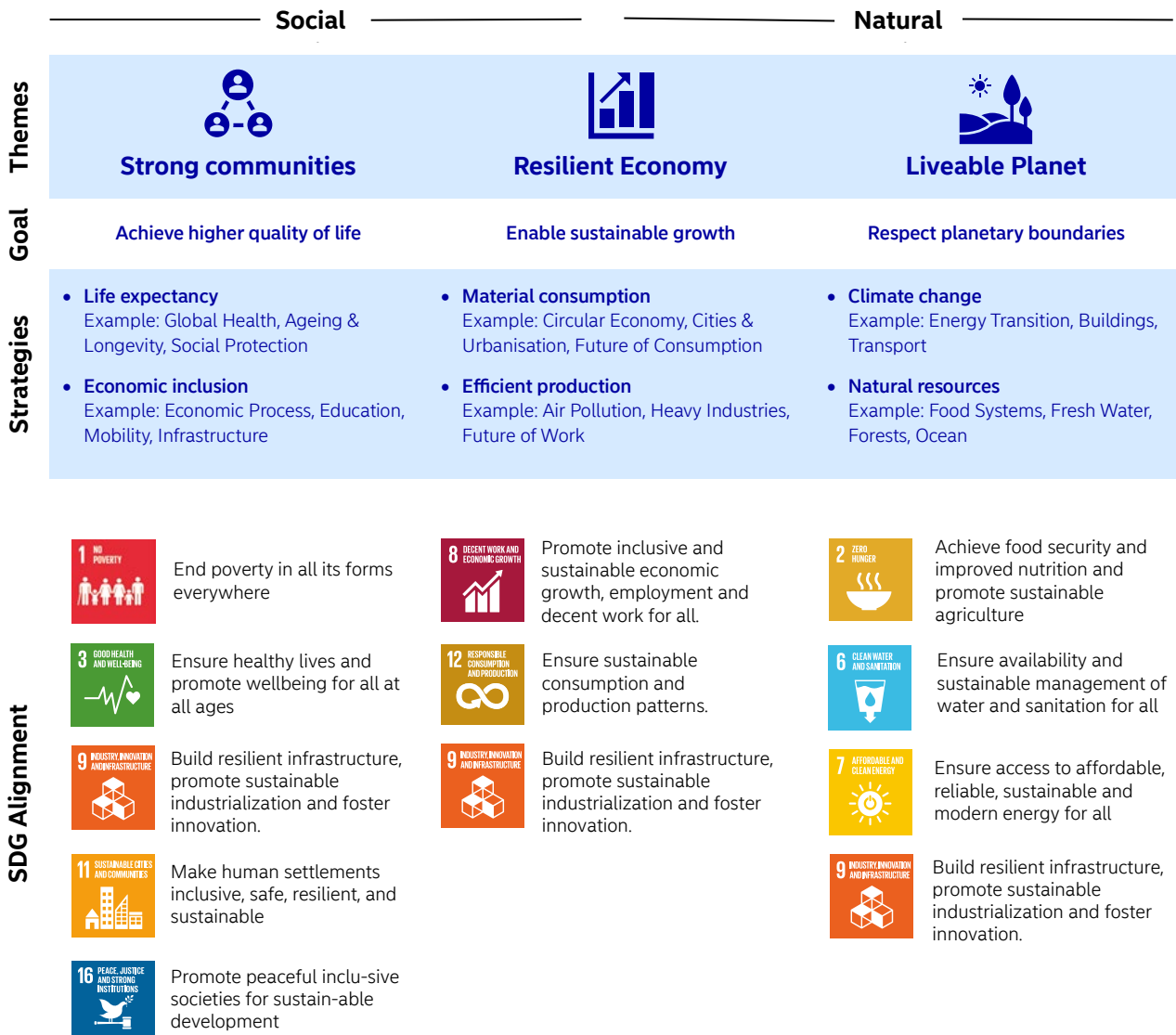
Our investment universe comprises global listed companies whose products and services and/or conduct of operations accelerate progress towards achieving these objectives. We believe that by identifying and investing in such companies, we can both generate competitive financial returns and contribute positive social and environmental outcomes.

To structure our impact objectives, we have clustered the identified sustainability challenges into three themes, each underpinned by a theory of change based on the underlying SDG targets and associated KPIs. These themes guide both our investment strategy and engagement activities.

- **Resilient Economy:** the theme focuses on companies developing responsible consumption patterns and efficient production methods. These enterprises integrate sustainability principles to enhance preparedness for potential disruptions to the way people live and work across the world
- **Livable Planet:** the theme targets investments in companies dedicated to reducing emissions or limiting the depletion of natural capital. The intent is to preserve and enhance our planet's ability to sustain a viable and thriving environment for human civilization
- **Strong Communities:** the theme directs investments towards companies that either provide access to essential goods and services, thereby improving individual quality of life, or create opportunities for economic inclusion. The overarching aim is to foster a more equitable society

Investment universe

Our impact objectives captured in a hand-picked thematic universe



Source: Nordea Investment Management AB, <https://sdgs.un.org/goals>.

2

Principle 2

Manage strategic impact on a portfolio basis

The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

The Nordea Global Impact Strategy (the "Strategy") is fundamentally designed to contribute to a more sustainable future for all stakeholders. We deliberately allocate capital to companies contributing to achieve our impact objectives through their products and services and/ or the conduct of their operations. Our stock selection is guided by the exposure of companies to our themes (Strong Communities, Resilient Economy, and Livable Planet) and the possibility to measure their beneficial effects on both society and the environment.

The strategy allocates the majority of assets to impact investments within the overall portfolio. Each eligible holding is assessed using our bespoke impact framework, built around the five pillars described under Principle 4 (pp. 9–10), which evaluates both the nature of the sustainability challenge addressed and the company's contribution through its business model.

The framework is fully embedded in the investment process and informs company research, fundamental valuation, portfolio construction, and active ownership activities. Impact considerations are therefore integrated alongside financial analysis throughout the investment life cycle, ensuring that impact objectives are systematically reflected in investment decisions, monitoring, and engagement.

Recognizing the importance of aligning incentives with impact objectives, Nordea Asset Management (NAM) has implemented a comprehensive approach to employee remuneration. All employees on variable remuneration schemes are evaluated against a mix of qualitative, quantitative,

financial, and non-financial performance goals tailored to their specific roles and responsibilities. These goals are carefully crafted to align with NAM's mission of delivering returns with responsibility, encompassing a high focus on investment risks, including sustainability risks. Furthermore, all employees have performance objectives linked to risk and compliance, including adherence to internal policies related to sustainability. This approach ensures that our variable remuneration schemes serve multiple purposes: aligning employee incentives with client interests, promoting NAM's long-term success, and fostering a sound risk management culture that explicitly includes sustainability considerations.

Specifically for the Global Impact Strategy, investment professionals are incentivized not only on financial performance but also on non-financial objectives. This approach incorporates a qualitative assessment of several key factors, including adherence to our impact framework, progress towards impact objectives, and the realization of positive societal and environmental outcomes. While the precise measurement of impact remains a complex endeavour, this incentive structure reflects our commitment to impact-oriented investing. It is designed to encourage our team to maintain a balanced focus on delivering competitive financial returns while simultaneously striving to create meaningful positive change. We aim to continuously refine our assessment methodologies to ensure they remain robust and aligned with evolving industry best practices in impact measurement and management.

3

Principle 3

Establish the Manager’s contribution to the achievement of impact

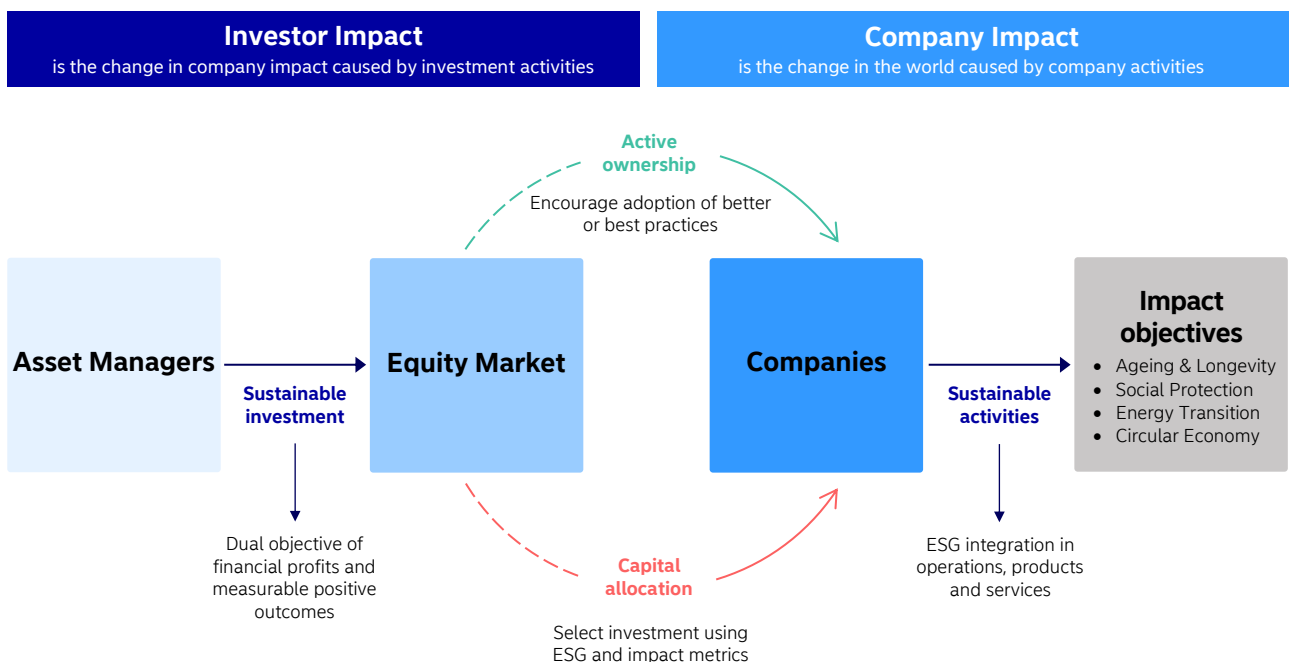
The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels. The narrative should be stated in clear terms and supported, as much as possible, by evidence.

As impact investors in listed equities, our primary channels to deliver social and environmental outcomes are active ownership and, to a lesser extent, capital allocation. On one hand, through engagement with individual investee companies, we aim to influence corporate behaviour and drive positive change. On the other hand, our capital allocation strategy sends a clear market signal that impact alignment and sustainable practices are valued and rewarded.

Given the nature of public equity markets, where ownership frequently changes hands, assessing the direct impact of our capital allocation presents challenges. Therefore, our focus is primarily on evaluating enterprise contribution, i.e. the positive outcomes from a company's activities and how it contributes to achieve our defined impact objectives.

Progress towards our defined impact objectives requires taking into account and limiting negative externalities (safeguarding positive contribution) and/or delivering additional positive outcomes (advocating for more sustainable business practices/ models). Therefore, these two areas are the core of our approach to active ownership in the context of impact investment.

We determine material ESG risks guided by a double materiality approach (to the company and to society). SASB is our main, but not only, framework to determine financial materiality. We consider a broad range of stated policy objectives to determine materiality to society, primarily guided by the UN SDG framework.



We may initiate engagement on any issue material to the investment or impact theses, including governance and reputational risks. Our engagement process is structured around a four-stage milestone system, allowing us to systematically track progress relative to company-specific objectives. These milestones range from initial communication of expectations to the ultimate delivery of desired outcomes by the company:

Milestone 1: Expectations are raised at the appropriate level with the company

Milestone 2: Company acknowledges them and wants to take action

Milestone 3: Company takes action or commits with clear timeframe

Milestone 4: Company's actions deliver the expected outcome

Every engagement comes with clear milestones and timeframes to measure progress towards the original proposal. We measure success by the degree to which we have achieved our initial objectives.

Should a company fail to reach milestone 4 within the established timeframe, we have a robust escalation process in place. This includes writing open letters to management teams, voting against relevant board directors or compensation packages, and collaborating with other investors to increase our influence.

The insights gathered during the engagement process inform our view of the impact case and help perform the assessments necessary under Principles 4, 5 and 6.

4

Principle 4

Assess the expected impact of each investment, based on a systematic approach

For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions:

(1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice.

The Nordea Global Impact Strategy applies a structured and evidence-based approach to assess the potential contribution of each prospective investment to its impact objectives. The Strategy's investment process integrates financially material impact considerations into fundamental valuation to ensure that, as investee companies prosper, positive outcomes linked to their business models expand. We recognize that, in global listed equities, the contribution of individual holdings is often incremental, but becomes meaningful through scale.

Our bespoke impact framework evaluates investments across the following dimensions:

I) Materiality

We emphasize the importance of companies being as specific as possible, at topic or sector level, in their ESG metrics to support robust data collection and evidence for impact investing. As the quality and granularity of corporate disclosure directly inform portfolio construction and monitoring, we place greater confidence in companies reporting against established ESG frameworks and standards (e.g. SASB, GRI, TCFD), particularly where disclosures are decision-useful and comparable over time.

II) SDG Model

We assess whether each holding derives a meaningful share of its revenues from activities

aligned with a specific SDG, based on the nature of the products or services provided.

This activity-based SDG mapping serves as a starting point to identify where a company's business model is positioned to address a defined sustainability challenge.

Our proprietary sustainable investment module identifies the SDG where the company has the largest revenue exposure, and therefore potential relevance, and reports the percentage of sales generated from products and services associated with that SDG.

III) Footprint

Using a double-materiality approach, we assess whether the company has adopted sustainable business practices that limit negative externalities and manage material ESG risks associated with its operations (e.g. carbon footprint, conduct of operations).

We analyze material ESG indicators and actions taken to mitigate adverse impacts. Our proprietary Principal Adverse Impact (PAI) module helps identify outliers across selected indicators. This analysis is complemented by in-house ESG scores (categorized as A, B, or C) that integrate SASB-based financial materiality mapping to support a structured assessment of both positive practices and residual negative impacts.

IV) Handprint

We research the sustainability profile of products and services, focusing on indicators related to beneficiaries and the significance of the change experienced. We manually collect company-reported data related to the nature and scale of outcomes resulting from product use or service delivery.

Our analysis is structured using the Five Dimensions of Impact from Impact Frontiers and indicators from IRIS+ and HIPSO, where relevant and available:

a) What

We identify the outcomes that the company's products or services are designed to enable and their relevance to stakeholders, focusing on the problem-solution logic embedded in the business model.

b) Who

We identify the primary stakeholders experiencing the effects of the offering, including the characteristics and contexts of affected populations or ecosystems, with particular attention to underserved or unmet needs where relevant.

c) How much

We seek to quantify the scale and, where possible, the depth of positive effects over a defined time period, using IRIS or HIPSO-aligned indicators matched to company-reported data or credible proxies.

d) Contribution

We describe the unique/improved benefits which the investee company promises to deliver to the current and future customers and our role as an investor within this Strategy.

Company contribution evaluates how products or services specifically address social or environmental challenges. Investor contribution examines our role in allocating capital to impactful solutions, but mostly our engagement with companies to enhance their impact practices, and sharing knowledge to improve impact potential.

e) Risk

We assess the likelihood that expected outcomes are not delivered, are less positive than anticipated, or are accompanied by unintended negative effects, considering operational, market, and external factors.

V) Double materiality

We invest in companies based on a combined assessment of risk, return, and impact, with the expectation that social or environmental outcomes delivered through the business model can reinforce long-term financial performance as the company grows. We therefore seek evidence of a positive relationship between the impact thesis and the company's financial drivers.

Impact considerations are integrated into the investment thesis to inform both stock selection and ongoing portfolio management across the investment lifecycle.

The outcome of our impact assessment is expressed through an impact conviction rating, reflecting the availability and quality of impact data, the materiality of impact to the business model, and performance across the core pillars of the framework (SDG model, footprint, and handprint). The high / medium / low rating scale supports decision-making in both portfolio management and engagement activities.

5

Principle 5

Assess, address, monitor and manage potential negative impacts of each investment

For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG) risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice. As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.

As an integrated part of the Global Impact investment process, an ESG analysis is conducted in order to ensure that each portfolio addition contributes positively to our impact objectives but also maintains a robust sustainability profile. The overall strategic assessment of a company is a combination of ESG, impact and fundamental factors, creating a holistic view of each company's positioning. This integrated approach is rigorously documented and applied consistently across our investment candidates.

To be considered eligible for investment in this Strategy, companies must first meet our definition of Sustainable Investments. This designation requires adherence to three critical criteria

1. **Meet minimum Good Governance criteria** – investee companies are screened on topics related to sound management structures, employee relations, remuneration of staff and tax compliance, and must not be subject to significant controversies related to any of these topics;
2. **Do not significant harm (“DNSH”) the environmental (or social) objective** – a company cannot perform negatively on selected principal adverse impact (“PAI”) indicators.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters. The thresholds defining negative outliers and poor performance vary for each PAI indicator;

3. **Environmental or Social Contribution** – our proprietary process applies a pass/fail criteria on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy, with a threshold determined under NAM's Sustainable Investment criteria, updated as required. Contribution may be measured on the proportion of revenue that can be linked to the above objectives. For sectors where capital expenditure or operating expenses or other relevant activity measures are more relevant, these will be used.

Failure to meet any of these criteria renders a company ineligible for investment in the Global Impact Strategy, in alignment with NAM's requirements for Article 9 products.

Furthermore, as previously detailed, our impact framework includes a review of the Footprint of each company that goes beyond traditional ESG risk management. At the core of the Footprint is a thorough assessment of each company's sustainability profile, with a particular emphasis on identifying and promoting industry-leading practices that drive positive change as well as to identify ESG indicators that could potentially mitigate a business's negative sustainability impacts. We leverage on our proprietary ESG data platform, which includes an advanced Principal Adverse Impact (PAI) module, allowing us to identify companies that are not only mitigating potential

negative impacts but are also demonstrating good performance across multiple PAI indicators.

More specifically, our DNSH test monitors a selected set of PAI indicators defined by NAM and updated periodically; companies identified as outliers in any of these areas are automatically disqualified from investment consideration. For companies that are not outliers but still demonstrate high adverse impacts, we conduct further analysis to determine their eligibility. In such cases, we may consider investment on the condition of improvement, which we actively pursue through targeted engagement strategies.

6

Principle 6

Monitor the progress of each investment in achieving impact against expectations and respond appropriately

The Manager shall use the results framework (referenced in Impact Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes.

The impact assessment conducted for each portfolio company is documented and stored in a common platform along with the respective ESG assessment. This approach facilitates a comprehensive view of both the impact and sustainability profile of our investments.

As we evaluate the impact profile of all our holdings through the application of bespoke impact framework, we also commit to monitor progress toward the achievement of sustainable development goals and our impact objectives of the investee companies.

Unless there is an event that prompts an immediate revision of the impact case, our assessments are reviewed on a regular basis (latest on an annual basis) to ensure that the companies are still progressing towards their impact objectives.

Our data collection process is guided by the IRIS+ System and primarily utilizes information from corporate disclosures, focusing on "external" indicators (e.g. outcome- or activity-based

measurements) over "internal" indicators (e.g. corporate culture, own workforce and supply chain-related metrics).

In order to bring additionality to our investment process, we seek to gather information and promote best practices through direct engagement with the company's management. We believe that such dialogue can effect positive changes in corporate behaviour and performance. Our engagement may include discussions with executives, recommendations on board composition, collaboration on shareholder voting, and ongoing monitoring of the company.

In order to comply with our principles of transparency and measurability, we report on an annual basis to our clients through our [Impact Report](#) for this Strategy, in which we disclose impact performance at portfolio level, our investment themes and respective theory of change, detailed impact cases as well as impact metrics for all portfolio holdings at a specific point in time.

7

Principle 7

Conduct exits considering the effect on sustained impact

When conducting an exit, the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.

Our exit considerations are intrinsically linked to our established sell discipline. Factors that may trigger divestment include strategic shifts or management changes that compromise impact potential, significant regression in ESG or sustainability metrics, persistent non-engagement on critical ESG matters, among other financial-related considerations.

Throughout the exit process, we maintain a commitment to responsible stewardship. This involves pursuing any ongoing dialogue with company management to sustain impact integrity until divestment. We also consider broader market implications and stakeholder effects of our capital allocation decisions.

Post-exit, we might conduct reviews to extract actionable insights. These learnings are incorporated into our investment framework, informing future capital allocation decisions and engagement strategies. This iterative process enhances our capacity to generate and sustain meaningful impact across our portfolio.

8

Principle 8

Review, document and improve decisions and processes based on the achievement of impact and lessons learned

The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.

We place a strong emphasis on the thorough evaluation of our investments' impact and engagement performances. This systematic review process is a cornerstone of our investment strategy, ensuring that we maintain a clear understanding of our portfolio's effectiveness and continuously improve our approach.

Our review process, which takes place at least annually, encompasses several key components. We begin with individual investee assessments, conducting in-depth analyses of each investee's specific impact metrics and engagement progress. This is complemented by a holistic portfolio evaluation, where we consider the collective impact of our investments, looking for synergies and overall portfolio performance.

Regular performance documentation is a crucial aspect of our methodology. We maintain detailed records of each investment's impact performance, creating a comprehensive database for future reference and analysis. As part of this process, we regularly revisit and test our initial investment assumptions against real-world outcomes, allowing us to refine our investment thesis over

time. This continuous improvement cycle ensures that insights gained from these reviews are systematically incorporated into our decision-making processes, enhancing both our operational efficiency and strategic direction.

The knowledge gained through our review process is not siloed but actively integrated into our investment framework at multiple levels. Specific lessons are applied to individual investment decisions, improving our impact due diligence processes. At the operational level, we continuously refine our management processes based on real-world experiences, enhancing our ability to support and guide investees.

By maintaining this rigorous review and learning process, we demonstrate our commitment to transparency in our investment practices, accountability to our stakeholders, and continuous improvement in our impact and engagement efforts. This approach ensures that we not only track the performance of our investments but also evolve our practices to maximize positive impact.

9

Principle 9

Publicly disclose alignment with the Impact Principles and provide regular independent verifications of the alignment

The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Impact Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.

This Disclosure Statement affirms the alignment of Nordea Asset Management's policies, tools and procedures with the Impact Principles and will be updated on an annual basis and published on our [website](#).

In accordance with requirements, Nordea Asset Management appointed an external and independent verifier.

Phenix Capital Group served as the external and independent verifier for the 2025 verification and conducted the review of the alignment of Nordea Global Impact Fund with the Operating Principles of Impact Management.

Phenix Capital Group's registered address is Amstelplein 54, Mondriaan Tower, 18th floor, 1096BC Amsterdam.

The verification team has not been involved in developing or implementing the impact strategy and management system, writing the Impact Principles disclosure statement, or participating in Nordea's operations, management, or investment processes.

The independent verification report on the alignment of Nordea Investment Management AB with the Operating Principles of Impact Management has been completed on April 2025 and the Verifier Statement is available [here](#).

The next independent verification is planned for the first quarter of 2027.

Nordea Asset Management is the functional name of the asset management business conducted by the legal entities Nordea Investment Funds S.A., Nordea Investment Management AB and Nordea Funds Ltd and their branches and subsidiaries. This material is intended to provide the reader with information on Nordea Asset Management specific capabilities, general market activity or industry trends and is not intended to be relied upon as a forecast or research. This material, or any views or opinions expressed herein, does not amount to an investment advice nor does it constitute a recommendation to buy, sell or invest in any financial product, investment structure or instrument, to enter into or unwind any transaction or to participate in any particular trading strategy. Unless otherwise stated, all views expressed are those of Nordea Asset Management. Views and opinions reflect the current economic market conditions, and are subject to change. Any investment decision should be based on the Offering Memorandum or any similar contractual arrangement. All investments involve risks; losses may be made. While the information herein is considered to be correct, no representation or warranty can be given on the ultimate accuracy or completeness of such information. Prospective investors or counterparties should discuss with their professional tax, legal, accounting and other adviser(s) with regards to the potential effect of any investment that they may enter into, including the possible risks and benefits of such investment, and independently evaluate the tax implications, suitability and appropriateness of such potential investments. Published by the relevant Nordea Asset Management entity. Nordea Investment Management AB and Nordea Investment Funds S.A. are licensed and supervised by the Financial Supervisory Authority in Sweden and Luxembourg respectively. Nordea Funds Ltd is a management company incorporated in Finland and supervised by the Finnish Financial Supervisory Authority. This material may not be reproduced or circulated without prior permission. © Nordea Asset Management.

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