

Policy for Responsible Investment Advisory Services and Sustainability Risks

1. Purpose of the Policy

The Policy for Responsible Investment Advisory Services and Sustainability Risks ("Policy" or "the Policy") describes the overall approach of Maj Invest Bank A/S ("Maj Invest Bank") to integrating responsible investment into the Bank's investment advisory services.

The Policy has been drawn up in accordance with Article 3 of the Disclosure Regulation (EU) 2019/2088 of 27 November 2019 ("SFDR") concerning the approach to integration of sustainability risks in investment advisory services. Besides fulfilling these regulatory requirements, the Policy also describes Maj Invest Bank's broader approach to responsible investment advisory services, including consideration of customers' sustainability preferences and the application of environmental, social and governance (ESG) data to the selection of securities.

Maj Invest Bank acts as investment adviser, for the purpose of providing investment advisory services to customers. The Bank does not develop its own investment products, and does not undertake discretionary portfolio management. Maj Invest Bank advises customers on investments in mutual funds, including mutual funds managed by Fondsmæglerselskabet Maj Invest A/S ("Maj Invest"), as well as mutual funds from other fund providers. The Policy applies to Maj Invest Bank and its employees.

2. Integration of sustainability risks in investment advisory services

Sustainability risk is defined – according to SFDR – as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

Climate and environmental risks

Climate and environmental risks include financial risks arising from exposure to an investment that may be affected by climate change or other forms of environmental degradation,

and the transition to a carbon-neutral economy. Here, a distinction is made between physical risks and transition risks.

Physical risks are related to more frequent and more extreme weather events, and may include business activities that are particularly vulnerable to these extreme weather conditions.

Transition risks concern the financial risks that companies may face as a consequence of the transition to a carbon-neutral economy. This might include investments in a sector with high carbon emissions, where the underlying assets become stranded, resulting in lost value and failing profitability.

Social risks

Social risks concern the financial risks faced by investors as a consequence of social or societal factors. These risks may develop as a consequence of changes in a number of societal aspects, and include social conditions, working conditions, human capital, diversity and inclusion.

Governance risks

Governance risks refer to the potential challenges and threats a company might face as a consequence of ineffective or incompetent management. These risks may affect the company's ability to achieve its own goals, protect its reputation and maintain good management and operations, which in overall terms can have a negative impact on the value of an investment.

Maj Invest Bank works systematically to identify and handle sustainability risks for the mutual fund products recommended by the Bank.

Maj Invest Bank advises on mutual fund products (i.e. units or shares in mutual funds that are non-complex products), but does not manage mutual funds. Therefore some elements of the EU Disclosure Regulation are relevant for Maj Invest Bank; but not all, however, such as requirements concerning portfolio management.

Maj Invest Bank handles and integrates sustainability risks in investment advisory services by assessing how such risks can affect the risk/return profile for the mutual fund products that are recommended to customers. This assessment is part of the advisory process in accordance with SFDR, Article 3.

Maj Invest Bank does not develop products, but advises on other parties' mutual fund products. Maj Invest Bank's approach to and documentation of sustainability risks is partly related to how the product providers approach and document sustainability risks.

For mutual fund products managed by Maj Invest, the Bank's starting point is Maj Invest's own assessments in relation to sustainability risks, including norm-based screening and product involvement.

For mutual fund products from external providers, the Bank bases its assessment on publicly available ESG information, including prospectuses, sustainability data and relevant annexes (Annex II and III) for Article 8 and Article 9 funds according to SFDR.

Customers of Maj Invest Bank receive information about sustainability risks when they enter into an agreement with Maj Bank and in reporting from Maj Invest Bank, including

- i) how Maj Invest Bank integrates sustainability risks in its investment advisory services, and
- ii) probable effects of sustainability risks on the return on the mutual fund products on which Maj Invest Bank advises, or
- iii) information that sustainability risks are not assessed to be relevant for the advisory services offered by Maj Invest Bank, and the reasons for this.

3. Fund selection process and ESG information

Maj Invest Bank adheres to a fixed process for the selection of recommended mutual fund products on which the Bank's investment advisory services are based. The process combines quantitative and qualitative assessments, to identify suitable mutual fund products that may be equities or bonds. The purpose is to ensure that all recommended mutual fund products meet the Bank's quality standards, and also to allow for the integration of ESG considerations.

At Maj Invest Bank, the customer's sustainability preferences are mapped as an element of the customer onboarding process. ESG factors are included in the qualitative assessment of each mutual fund product as an integrated element of Maj Invest Bank's approach to responsible investment advisory services. The assessment includes the Fund's sustainability focus, governance practice and SFDR classification. Maj Invest Bank assesses whether the Bank can match these preferences, which entails that ESG factors are an integrated element of the suitability assessment. The customer also receives information on the mutual fund

products for which Maj Invest Bank provides advisory services, including for products with a sustainability purpose or with sustainability as one of several characteristics.

For mutual fund products managed by Maj Invest, Maj Invest Bank makes an overall assessment of the individual products, compared to the customer's sustainability preferences. The assessment includes norm-based screening, assessment of product involvement, and assessments of ESG risks, opportunities and contributions, based on company data, external research and other relevant information.

For mutual fund products managed by other managers, the Bank bases its assessment on publicly available ESG information, such as prospectuses, sustainability data and, where relevant, Annex II and III publication for Article 8 and Article 9 funds according to SFDR.

Maj Invest Bank maintains a reference list that emphasises funds with a special ESG orientation, including funds classified as Article 8 or 9 according to SFDR, that can be included in the advisory process. ESG factors are assessed together with financial characteristics such as performance, costs and risk, so that the recommendations reflect both financial suitability and the customer's sustainability preferences.

Maj Invest Bank continuously assesses its recommended funds to ensure their continued suitability and to identify changes in strategy, risk profile or ESG approach. Relevant updates are discussed internally by a working group and are documented. The CEO must ensure that these processes are reflected in procedures for the selection of recommended mutual funds and in product governance, etc.

4. Infringement and revision

Responsibility for compliance with this policy is held by the CEO of Maj Invest Bank A/S.

If the CEO of the company subject to the Policy finds an instance of non-compliance with the Policy, the CEO must notify this to the Board of Directors at the next meeting of the Board of Directors. In collaboration with the Board of Directors, the CEO must take the measures necessary to ensure that the Policy is complied with once again.

The Policy is revised annually by the company's CEO, or as required, including on any significant changes in the assumptions underlying the Policy. This is thereafter approved by the company's Board of Directors.

Questions concerning Maj Invest Bank's Sustainability Risk Policy may be addressed to the CEO at info@majbank.dk.

5. Entry into force

This Policy enters into force on 2 December 2025.

Discussed and approved by the Board of Directors on 2 December 2025 and subsequently signed using digital signature.

Board of Directors:

Chairman of the
Board of Directors
Jesper Berg

Board member

Søren Kolbye Sørensen

Board member
Henrik Parkhøi

Board member
Marianne Settnes

Adopted by:

CEO
Brian Buus Madsen

APPENDIX 1: Relevant references to codes of conduct for responsible business practice and internationally recognised standards for due diligence and reporting, etc.

Important business partners, codes of conduct, standards, etc. for sustainability.	Companies
Cooperation with third party data provider on sustainability screening and engagement	MI, MIE
Collaboration with ComplyAdvantage on sanction screening	MI, MIE and MB
Collaboration with ISS on voting	MI
Adoption of PRI	MI, MIE
Adoption of IIGCC (The Institutional Investors Group on Climate Change)	MIE
Transparency International Danmark	MI
Various standards for sustainability and reporting, as a consequence of SFDR and other EU and DK regulation	MI, MIE and MB
Code of conduct CFA Asset Manager Code	MI
Code of conduct: International PE and Venture Capital Valuation Guidelines	MIE
Code of conduct: Active Owners' tax code	MIE
IA 50	MIE