



Table 1

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant								
Carnegie Investment Bank AB (Private Banking SE), LEI 529900BR5NZNQZEVQ417								
Summary								
<p>Carnegie Investment Bank AB (Private Banking SE), LEI 529900BR5NZNQZEVQ417 considers principal adverse impacts of its investment decisions on sustainability factors. We screen investments and external fund managers against excluded sectors and use data from MSCI ESG. We continuously work to integrate sustainability risks into the investment decisions made in the bank's managed funds, portfolio management and advisory management through, among other things, by integrating the UN Global Compact (UNGC), in the screening of potential investments and by working on diversification. Carnegie Investment Bank conducts engagement activities on behalf of its clients to safeguard good returns on its investments and sound practices in investee companies. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Carnegie Private Banking.</p> <p>This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024. The results of the indicators are based on data from an external data provider MSCI ESG. The degree of coverage and whether the data is or is partially based on estimates is stated under the heading Explanation.</p>								
Description of the principal adverse impacts on sustainability factors								
Indicators applicable to investments in investee companies								
Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	81,201.83	65,931.58	93.01%	87.04%	5.97%	Sum of portfolio companies' Carbon Emissions - Scope 1 (metric tons) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).
		Scope 2 GHG emissions	22,548.25	19,741.89	93.01%	85.03%	7.98%	Sum of portfolio companies' Carbon Emissions - Scope 2 (metric tons) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).
		Scope 3 GHG emissions	888,460.74	793,197.99	93.06%	0.00%	93.06%	Sum of portfolio companies' Carbon Emissions - Scope 3 (metric tons) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash (EVIC).
		Total GHG emissions	993,399.83	878,826.98	93.00%	0.00%	93.00%	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).
	2. Carbon footprint	Carbon footprint	359.10	422.11	93.00%	0.00%	93.00%	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).
	3. GHG intensity of investee companies	GHG intensity of investee companies	801.69	832.15	93.72%	0.00%	93.72%	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions EUR/million revenue).
Actions taken: We screen all of our investments against several criteria's including companies that have 5% or more of their revenue from production or distribution of coal, gas and/or oil. In our portfolios where we directly own shares, we exclude these companies. We have a sub-fund that focuses on the green transition and on reducing greenhouse gas emissions. We also launched an article 9 portfolio that focuses on the green transition, circular economy, water and biodiversity. Actions planned: In our Swedish and global stockpicking portfolios we will continue to exclude companies that have 5% or more of their revenue from production or distribution of coal, gas and/or oil. Our Nordic stockpicking portfolio strives for lower CO2 emissions than the benchmark. Target: In our article 8 portfolios we strive for lower CO2 emissions than the benchmark.								



Table 1

Statement on principal adverse impacts of investment decisions on sustainability factors

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies									
Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Greenhouse gas emissions	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	4.88%	6.31%	93.72%	93.72%	0.00%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including exploration, extraction, mining, storage, distribution and trading of oil and gas, production and distribution of thermal coal, and production, distribution, storage, and reserves of metallurgical coal, rebalanced by the sub-portfolio of corporate holdings.	Actions taken: We screen all of our investments against several criteria's including companies that have 5% or more of their revenue from production or distribution of coal, gas and/or oil. In our portfolios where we directly own shares, we exclude these companies. We have a sub-fund that focuses on the green transition and on reducing greenhouse gas emissions. We also launched an article 9 portfolio that focuses on the green transition, circular economy, water and biodiversity. Actions planned: In our Swedish and global stockpicking portfolios we will continue to exclude companies that have 5% or more of their revenue from production or distribution of coal, gas and/or oil. Our Nordic stockpicking portfolio strives for lower CO2 emissions than the benchmark. Target: In our article 8 portfolios we strive for lower CO2 emissions than the benchmark.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	56.21%	63.35%	79.64%	79.64%	0.00%	The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy use generated.	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	A: 2.26 B: 1.21 C: 0.60 D: 2.50 E: 0.84 F: 0.09 G: 0.19 H: 1.80 L: 0.47	A: 3.55 B: 1.17 C: 0.39 D: 2.35 E: 2.34 F: 0.07 G: 0.2 H: 1.21 L: 0.46	A: 85.20% B: 85.20 % C: 85.20% D: 85.20% E: 85.20% F: 85.20% G: 85.20% H: 85.20% L: 85.20%	A: 85.20% B: 85.20% C: 85.20% D: 85.20% E: 85.20% F: 85.20% G: 85.20% H: 85.20% L: 85.20%	0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00%	The portfolio's weighted average of Energy Consumption Intensity (GWh/million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing) Code B (Mining and Quarrying) Code C (Manufacturing) Code D (Electricity, Gas, Steam and Air Conditioning Supply) Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) Code F (Construction) Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) Code H (Transportation and Storage) Code L (Real Estate Activities)	
Biodiversity	7. Activities negatively affecting bio diversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	8.97%	5.94%	94.06%	0.00%	94.06%	The percentage of the portfolio's market value exposed to issuers' that either have operations located in or near biodiversity sensitive areas, are assessed to potentially negatively affect local biodiversity, and have no impact assessment; or they are involved in controversies with severe impact on local biodiversity, rebalanced by the sub-portfolio of corporate holdings.	Actions: We screen all of our investments for alignment with the United Nations Global Compact principles (including Principle 7 Businesses should support a precautionary approach to environmental challenges) based on MSCI ESG. We also launched an article 9 portfolio that focuses on the green transition, circular economy, water and biodiversity.. Targets: Due to the fact that the reported data is so insufficient, it is difficult to make any analyses. Our focus will be to continue monitoring the area to see how we can minimize our footprint.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.04	0.06	8.79%	8.79%	0.00%	The total water emissions (metric tons) associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Water Emissions (metric tons) per company divided by the company's most recently available enterprise value including cash (EVIC).	Actions: We screen all of our investments for alignment with the United Nations Global Compact principles (including Principle 7 Businesses should support a precautionary approach to environmental challenges) based on MSCI ESG. We also launched an article 9 portfolio that focuses on the green transition, circular economy, water and biodiversity. Target: Due to the fact that the reported data is so insufficient, it is difficult to make any analyses. Our focus will be to continue monitoring the area to see how we can minimize our footprint.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	3.98	7.35	46.55%	46.55%	0.00%	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Actions: We screen all of our investments for alignment with the United Nations Global Compact principles (including Principle 7 Businesses should support a precautionary approach to environmental challenges) based on MSCI ESG. We also launched an article 9

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS									
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises.	0.09%	0.12%	93.69%	0.00%	93.69%	The percentage of the portfolio's market value exposed to issuers that fail to align with the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises based on MSCI ESG Research methodology, rebalanced by the subportfolio of corporate holdings.	Actions: We screen all of our investments for alignment in MSCI Global Norms Screening. Target: Zero exposure against companies that has violations against UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises).
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.88%	0.61%	93.75%	93.75%	0.00%	The percentage of the portfolio's market value exposed to issuers that do not have at least one policy covering some of the UNGC principles or OECD Guidelines for Multinational Enterprises (e.g. human rights, labor due diligence, or anti-bribery policy) and either a monitoring system evaluating compliance with such policy or a grievance / complaints handling mechanism, rebalanced by the subportfolio of corporate holdings.	Actions: Our aim is to avoid investments in companies without policies to monitor compliance with the UNGC principles , OECD, ILO and UNGP. Target: Increase the share of companies that has policies and compliance mechanisms to monitor compliance with UN Global Compact principle. We will also start screening for violations against OECD Guidelines for Multinational Enterprises.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	11.90%	12.31%	33.70%	33.70%	0.00%	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	Actions: We screen all of our investments for alignment with the United Nations Global Compact principles (including Principle 6 Businesses should uphold the elimination of discrimination in respect of employment and occupation) based on MSCI ESG Research. Target: Due to the fact that the reported data is so insufficient, it is difficult to make any analyses. Our focus will be to continue monitoring the area and set a quantative target once the reported data has improved.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	37.00%	36.61%	93.09%	93.09%	0.00%	The portfolio holdings' weighted average of the percentage of female board members to total board members.	Actions: Our aim is to avoid investments in companies that is not aligned with the United Nations Global Compact principles (including Principle 6 Businesses should uphold the elimination of discrimination in respect of employment and occupation) based on MSCI ESG Research. Target: We strive for a distribution between 40/60 either way in gender diversity.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.04%	0.07%	94.18%	94.18%	0.00%	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	Actions: We screen all of our investments against involvement in the manufacture or selling of controversial weapons. Target: Zero exposure against controversial weapons

Indicators applicable to investments in sovereigns and supranationals									
Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	205.31	237.18	89.48%	89.48%	0.00%	The portfolio's weighted average of sovereign issuers' Country GHG intensity (tons CO2e/EUR M GDP).	Action: Our government bond investment is mainly in Sweden, US and Europe which all have commitments towards net zero. Target: Strive to only invest in countries that has climate commitments.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	Absolute:0.75 Relative:1.71%	Absolute: 2 Relative:2.63%	89.48%	0.00%	89.48%	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports. The portfolio's percentage of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports.	Actions: Our exposure here is related to one hedge fund position in emerging markets in our liquid alternative's portfolio. Since the reference period the position has been deinvested and we will closely monitor this going forward. Target: Zero exposure against countries subject to social violations.
Indicators applicable to investments in real estate assets									
Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	No data available	No data available	0.00%	0.00%	0.00%	Not currently available.	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	No data available	No data available	0.00%	0.00%	0.00%	Not currently available.	N/A



Table 2

Additional climate and other environment-related indicators									
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Indicators applicable to investments in investee companies									
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS									
	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	38.23%	36.89%	93.64%	0.00%	93.64%	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	<p>Carnegie is committed to aligning with the Paris Agreement and enhancing our environmental stewardship. Action taken: We screen all of our investments against several criteria, including companies that derives 5% or more of their revenue from production or distribution of coal, gas and/or oil. In our portfolios where we directly own shares, we exclude these companies. For a more detailed explanation, please visit each subsidiary's PAI statement, see link above.</p> <p>Target: By 2040, none of our portfolio companies will have more than 2% of its revenues derived from production or distribution of coal, gas and/or oil.</p>

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters									
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS									
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Coverage	Estimated	Reported	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Indicators applicable to investments in investee companies									
Social and employee matters	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers	1.14%	1.64%	93.75%	93.75%	0.00%	The percentage of the portfolio's market value exposed to issuers without a whistleblower protection policy.	Actions: Screen all companies for Un Global Compact indicator 10, whereby all businesses should work against corruption in all its forms, including extortion and bribery. Goals: Ensure sufficient whistleblower protection within the companies in our portfolios to address the lack of adequate protection for whistleblowers. The goal is for all companies in the portfolio to be able to handle and report irregularities and corruption anonymously and without fear of reprisal. Therefore, we would like to increase the proportion of companies signing UN Global Compact and exclude companies that have proven to violate the norms referred to in indicator 10.
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	4.34%	5.18%	93.75%	93.75%	0.00%	The percentage of the portfolio's market value exposed to issuers without a formal human rights policy.	Actions: We screen our investments in companies that do not respect human rights or cannot demonstrate action plans and concrete measures to address violations and prevent recurrence. Goal: Carnegie is a member of the UN Global Compact initiative and adheres to its ten principles covering human rights, the environment, labor rights, and anti corruption. Our goal is that none of the companies in which we invest will violate human rights

Description of policies to identify and prioritize principal adverse impacts on sustainability factors

Carnegie Private Banking's governing body decided on the ESG strategies on 2022-11-21. Carnegie considers negative consequences for sustainability factors in our discretionary portfolio management. We screen investments and external fund managers against excluded sectors and use data from MSCI ESG. We continuously work to integrate sustainability risks into the investment decisions made in the bank's managed funds, portfolio management and advisory management through, among other things, by integrating the UN Global Compact (UNGC), in the screening of potential investments and by working on diversification. Find out more on <https://www.carnegie.se/en/approach-to-sustainability/>

Data source used: MSCI

Engagement policies

Carnegie Investment Bank conducts engagement activities on behalf of its clients to safeguard good returns on its investments and sound practices in investee companies. Engagement activities consist primarily of monitoring, where we screen our investments on regular basis against excluded sectors, violations against UN Global Compact and sanction lists. It also includes conducting dialogues with management in investee companies and voting at shareholders meeting. Carnegie may decide to abstain from investing if target companies don't meet our requirements. Also, Carnegie may divest existing holdings for the same reason. Meeting investee companies management on a regular basis is an integral part of the investment process so