

<b>Owner</b>	Head of Fund Products	<b>Date of Approval</b>	March 2021
<b>Administrator</b>	Head of Fund Products	<b>Policy Version</b>	Version 1.0
<b>Approved and legally owned by</b>	Board of Directors of Investeringsforeningen Profil Invest, Kapitalforeningen Danske Invest Institutional and AP Invest Kapitalforening	<b>For external publication</b>	No

# Responsible Investment Policy

## 1. Objective

The objective of this Responsible Investment Policy is to govern the approach to responsible investments while ensuring adherence to applicable laws and regulations such as the Sustainable Finance Disclosure Regulation, the fund laws and other sectoral regulations.

When our investors entrust us with their savings, it is our aim to serve their interests by creating satisfactory returns. To discuss Responsible Investment with the investors is an integral part of this duty.

## 2. Definitions

The below definitions apply to the terms used throughout the Policy.

<b>Active Ownership</b>	means the use of rights and position of ownership to influence the activities or behaviour of investee companies
<b>Associations</b>	means Investeringsforeningen Profil Invest, Kapitalforeningen Danske Invest Institutional and AP Invest Kapitalforening including sub-funds
<b>Investment Products</b>	means sub fund in Investeringsforeningen Profil Invest, Kapitalforeningen Danske Invest Institutional and AP Invest Kapitalforening
<b>Investment Manager</b>	means the party undertaking investments of assets including securities transactions on behalf of the Sub-Fund. This includes investment advisors giving investment advice and related services
<b>Sustainable Finance Disclosure Regulation</b>	means Regulation (EU) 2019/2088 of the European Parliament and Council on sustainability-related disclosures in the financial services sector
<b>Sustainability Risk</b>	means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment
<b>Target Group</b>	means Investment Managers and other employees involved in the management of the Investment Products

### 3. Scope

This Policy outlines principles for responsible investments, including Sustainability Risk integration in investment decision making processes within Investment Products provided.

#### 3.1 Target Group

This Policy applies to Investment Managers and other employees involved in the management of the Investment Products

### 4. Policy content

**Principle 1: The Associations has no general policy as the policy is defined in each Investment Products as the Associations serve different investor needs.**

The definition in the Investment Products are typically: 1) The Responsible Investment Policy of Danske Invest with/without modifications 2) The Responsible Investment Policy of the investor in the Investment Product or 3) no investor requirement of inclusion of responsible investment consideration in the investment decision. Considerations can be included indirectly via choice of investment manager/advisor, investment universe etc.

**Principle 2: We can be active owners and incorporate environmental, social, and governance criteria and sustainability issues into Active Ownership**

We can be active owners via delegation of voting rights to the investor in the Investment Product or to an entity which the investor in the Investment Product has chosen. Otherwise, the Board will not perform any voting unless in special occasions on the request of the investor.

### 5. Review

This Policy is managed by the Board of Directors. The Policy must be reviewed and approved at least annually or more frequently where required.

### 6. Change log

Date	Version number	Comments/changes
3 <sup>rd</sup> March 2021	Version 1.0	New policy created