

RI TRANSPARENCY REPORT

2020

Ohman

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2020 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
🔍	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG		🔒	n/a							
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Public							✓
OO 08	Segregated mandates or pooled funds	🔒	n/a							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	Active ownership practices for listed assets	✓	Public							✓
OO 11	ESG incorporation practices for all assets	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown of listed equity investments by passive and active strategies	✓	Public							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	🔒	n/a							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	✓	Public							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	🔒	n/a							✓
OO FI 03	Fixed income breakdown by market and credit quality	✓	Public							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	🔒	n/a							✓
OO PE 01	Breakdown of private equity investments by strategy	🔒	n/a							✓
OO PE 02	Typical level of ownership in private equity investments	🔒	n/a							✓
OO PR 01	Breakdown of property investments	🔒	n/a							✓
OO PR 02	Breakdown of property assets by management	🔒	n/a							✓
OO PR 03	Largest property types	🔒	n/a							✓
OO INF 01	Breakdown of infrastructure investments	🔒	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	🔒	n/a							✓
OO INF 03	Largest infrastructure sectors	🔒	n/a							✓
OO HF 01	Breakdown of hedge funds investments by strategies	🔒	n/a							✓
OO End	Module confirmation page	✓	-							

CCStrategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Public							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Public							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	✓	Public							✓
SG 08	RI in performance management, reward and/or personal development	✓	Public							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	🔒	n/a	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Public				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		✓	Public							✓
SG 14	Long term investment risks and opportunity	✓	Public	✓						
SG 14 CC		✓	Public							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Public	✓						
SG 16	ESG issues for internally managed assets not reported in framework	🔒	n/a							✓
SG 17	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
SG 18	Innovative features of approach to RI	✓	Public							✓
SG 19	Communication	✓	Public		✓				✓	
SG End	Module confirmation page	✓	-							

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Percentage of each incorporation strategy	✓	Public	✓						
LEI 02	Type of ESG information used in investment decision	✓	Public	✓						
LEI 03	Information from engagement and/or voting used in investment decision-making	✓	Public	✓						
LEI 04	Types of screening applied	✓	Public	✓						
LEI 05	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 06	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 07	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
LEI 08	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 09	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 10	Aspects of analysis ESG information is integrated into	✓	Public	✓						
LEI 11	ESG issues in index construction	✓	Public	✓						
LEI 12	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
LEI 13	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
LEI End	Module confirmation page	✓	-							

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓					
LEA 06	Role in engagement process	✓	Public		✓		✓			
LEA 07	Share insights from engagements with internal/external managers	✓	Public	✓	✓					
LEA 08	Tracking number of engagements	✓	Public		✓					
LEA 09	Number of companies engaged with, intensity of engagement and effort	✓	Public		✓					
LEA 10	Engagement methods	✓	Public		✓					
LEA 11	Examples of ESG engagements	✓	Public		✓					
LEA 12	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 13	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 14	Securities lending programme	✓	Public		✓					
LEA 15	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 16	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 17	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 18	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 19	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 20	Shareholder resolutions	✓	Public		✓					
LEA 21	Examples of (proxy) voting activities	✓	Private		✓					
LEA End	Module confirmation page	✓	-							

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Incorporation strategies applied	✓	Public	✓						
FI 02	ESG issues and issuer research	✓	Public	✓						
FI 03	Processes to ensure analysis is robust	✓	Public	✓						
FI 04	Types of screening applied	✓	Public	✓						
FI 05	Examples of ESG factors in screening process	✓	Public	✓						
FI 06	Screening - ensuring criteria are met	✓	Public	✓						
FI 07	Thematic investing - overview	✓	Public	✓						
FI 08	Thematic investing - themed bond processes	✓	Public	✓						
FI 09	Thematic investing - assessing impact	✓	Public	✓						
FI 10	Integration overview	✓	Public	✓						
FI 11	Integration - ESG information in investment processes	✓	Public	✓						
FI 12	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 13	ESG incorporation in passive funds	✓	Private	✓						
FI 14	Engagement overview and coverage	✓	Public		✓					
FI 15	Engagement method	✓	Public	✓	✓					
FI 16	Engagement policy disclosure	✓	Public	✓	✓					
FI 17	Financial/ESG performance	✓	Public							✓
FI 18	Examples - ESG incorporation or engagement	✓	Public	✓	✓					
FI End	Module confirmation page	✓	-							

Confidence building measures				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM1 01	Assurance, verification, or review	✓	Public							✓
CM1 02	Assurance of last year's PRI data	✓	Public							✓
CM1 03	Other confidence building measures	✓	Public							✓
CM1 04	Assurance of this year's PRI data	✓	Public							✓
CM1 05	External assurance	🔒	n/a							✓
CM1 06	Assurance or internal audit	🔒	n/a							✓
CM1 07	Internal verification	✓	Public							✓
CM1 01 End	Module confirmation page	✓	-							

Ohman

Reported Information

Public version

Organisational Overview

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

Further options (may be selected in addition to the above)

- ☐ Hedge funds
- ☐ Fund of hedge funds

OO 01.2

Additional information. [Optional]

The Öhmans group parent company has signed the PRI. The report refers to the subsidiary Öhman Fonder unless otherwise stated. Öhman Fonder is the Group's fund and asset manager.

OO 02

Mandatory

Public

Peering

General

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).

FTE

80

OO 03**Mandatory****Public****Descriptive****General****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****Public****Gateway/Peering****General****OO 04.1**

Indicate the year end date for your reporting year.

31/12/2019

OO 04.2

Indicate your total AUM at the end of your reporting year.

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM		95	588	000	000
Currency	SEK				
Assets in USD		9	988	073	697

☐ Not applicable as we are in the fund-raising process

OO 04.4

Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

☒ Not applicable as we do not have any assets under execution and/or advisory approach

OO 06	Mandatory	Public	Descriptive	General
-------	-----------	--------	-------------	---------

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

☒ as percentage breakdown

	Internally managed (%)	Externally managed (%)
Listed equity	70	0
Fixed income	30	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0

Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

☐ as broad ranges

OO 06.2	Publish asset class mix as per attached image [Optional].
----------------	---

OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].
----------------	---

☐ Yes

☐ No

OO 06.5	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 07	Mandatory to Report Voluntary to Disclose	Public	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		SSA
	13	
		Corporate (financial)
	18	
		Corporate (non-financial)
	39	
		Securitised
	30	
		Total
	100%	

OO 09	Mandatory	Public	Peering	General
-------	-----------	--------	---------	---------

OO 09.1	Indicate the breakdown of your organisation's AUM by market.
---------	--

	Developed Markets
95	
	Emerging Markets
5	
	Frontier Markets
0	
	Other Markets
0	
	Total 100%
100%	

Asset class implementation gateway indicators

OO 10	Mandatory	Public	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 SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- ☒ We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

	Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.
--	---

We invest mainly in Swedish Government Bonds and do not see any reason or possibility to engage.

	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	Public	Gateway	General
-------	-----------	--------	---------	---------

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	Public	Gateway	General
-------	-----------	--------	---------	---------

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 - SSA
- ☒ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)
- ☒ Fixed income - Securitised

	Closing module
--	----------------

- ☒ Closing module

Peering questions

OO LE 01	Mandatory to Report Voluntary to Disclose	Public	Gateway	General
----------	---	--------	---------	---------



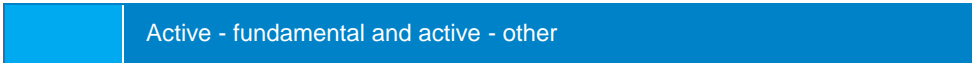



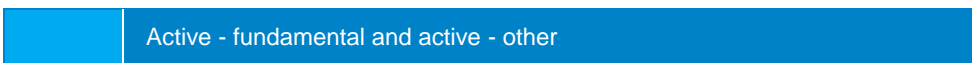



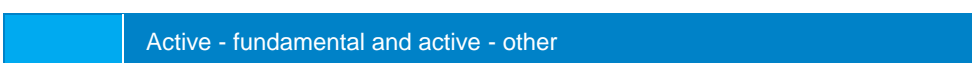

OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.
------------	---

Percentage of internally managed listed equities

	Passive
35	
	Active - quantitative (quant)
0	
	Active - fundamental and active - other
65	
	Total
100%	

OO FI 01	Mandatory to Report Voluntary to Disclose	Public	Gateway	General
----------	---	--------	---------	---------

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

SSA	 Passive
	2
	 Active - quantitative (quant)
	0
	 Active - fundamental and active - other
	98
Corporate (financial)	 Total
	100%
	 Passive
	0
	 Active - quantitative (quant)
	0
Corporate (non-financial)	 Active - fundamental and active - other
	100
	 Total
	100%
	 Passive
	0
	 Active - quantitative (quant)
	0
	 Active - fundamental and active - other
	100
	 Total
	100%

Securitised		Passive
	2	
		Active - quantitative (quant)
	0	
		Active - fundamental and active - other
	98	
		Total
	100%	

OO FI 03	Mandatory	Public	Descriptive	General
----------	-----------	--------	-------------	---------

Update: this indicator has changed from "*Mandatory to report, voluntary to disclose*" to "*Mandatory*". **Your response to this indicator will be published in the Public Transparency Report.** This change is to enable improved analysis and peering.

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

SSA		Developed markets
	100	
		Emerging markets
	0	
		Total
	100%	

OO FI 03.2	Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.
------------	---

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	100%
Corporate (non-financial)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	100%
Securitised	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	100%

If you are invested in private debt and reporting on ratings is not relevant for you, please indicate below

☐ OO FI 03.2 is not applicable as our internally managed fixed income assets are invested only in private debt.

Ohman

Reported Information

Public version

Strategy and Governance

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Investment policy

SG 01

Mandatory

Public

Core Assessed

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

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.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <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"/> Fiduciary (or equivalent) duties <input type="checkbox"/> Asset class-specific RI guidelines <input 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)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

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
- ☒ Understanding and incorporating client / beneficiary sustainability preferences
- ☐ Other RI considerations, specify (1)
- ☐ Other RI considerations, specify (2)

SG 01.4

Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

It is not only our duty as investors to create long-term financial value for our customers, but also to take into account the effects of our investments on society. At Öhman, we are convinced that the challenges we face in the near future place new demands on us as managers of our customers' capital. Öhman advocates sustainable corporate governance and good ethics in the companies in which we invest. By integrating sustainability aspects into the investment process, we find new investment opportunities. Among tomorrow's winners are companies that make decisions with an understanding of future demands for responsible business. As a responsible investor, we also reduce the risk in our investments by avoiding; trademark damage, production stoppages, lawsuits etc. and can deliver a long-term sustainable return to our customers. Öhman invest in companies that 1. has a well-developed sustainability work that addresses the company's risks given the company's size and geographical presence, or 2. recently started work on developing a sustainability strategy, showing clear signs of prioritizing the area. And have interesting products and services with a clear sustainability link where we see a clear increase in demand.

SG 01.5

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Öhman is a signatory of UN backed Principles for Responsible Investment. Companies we invest in shall comply with well accepted international conventions and guidelines, based on the UN Global Compact 10 principles. We believe that companies integrating UN Guiding Principles on Business and Human Rights, and that has developed Science Based Climate Targets and act to operate in line with the Paris Agreement are better investment over the long run.

Öhman has during 2019 developed a white paper outlining and clarifying our approach to responsible investment. The purpose of this document is to present:

- the strategies we use
- Our methodology for identifying and assessing ESG risks in our analysis process
- Some company analysis as examples of how our ESG analysis influences investment decisions

An ESG analysis means that we make an assessment of a company's preparedness and management of, for the company, significant sustainability factors - factors that may affect the company's financial position and development (positive or negative). An ESG analysis evaluates the company's policies, management systems and other information that the companies have published, eg. in the annual / sustainability report. Supplementary information is obtained by visiting the companies or visiting studies at the companies' facilities.

Since sustainability can encompass many factors and is defined in different ways, in the ESG analysis we must focus on a limited number of criteria that can actually affect a company's financial development, so-called. material criteria. We work to identify the factors that we consider to be most material.

☐ No

SG 01 CC	Mandatory to Report Voluntary to Disclose	Public	Descriptive	General
----------	---	--------	-------------	---------

SG 01.6 CC	Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.
------------	---

☒ Yes

	Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.
--	--

We identify and classify transition risks and physical climate-related risks as follows:

- **Regulatory risks**, such as climate regulations, higher price on greenhouse gas emissions. For the companies we invest in this could imply higher regulatory costs, reporting, risk of fines and lawsuits as well as operational costs.
- **Technological risks** such as investments in new technologies and higher costs due to depreciation of old technologies. For companies this means higher risk for capital depletion, stranded assets/technologies and increased need of successful R&D.
- **Market risks**, changing consumer demand and behavior, increased costs for raw material. Impact on companies such as decreased demand for specific products and services, increased production costs and changing valuations.
- **Reputational risks**, stigmatized sectors, change in preferences, increased accountability and oversight. Impact on brand reputation and difficulties to recruit and keep personnel.
- **Acute physical risks**: more extreme weather events. Could lead to decreased revenues due to smaller production capacity. Unplanned disruptions and impact on assets.
- **Chronic physical risks**: changed weather patterns, higher average temperatures and rising sea levels. Impacts such as higher cost of capital, less revenues, premature phase-out of assets and higher insurance premiums.

These risks are regularly discussed in our portfolio management team and with companies. For example, we have identified companies with a high carbon intensity and engaged with them on how they are preparing to align their operations and tackle a potentially higher carbon price. This has in some cases led us to the decision to exclude/sell specific holdings. This risk framework is also used when we evaluate investments within certain sectors such as forestry, transportation/shipping, real estate etc. Different sectors are exposed to different climate-related risks, for example mainly transition risks within transportation and banking, and mainly physical risks within real estate.

☐ No

SG 01.7 CC	Indicate whether the organisation has assessed the likelihood and impact of these climate risks?
------------	--

☐ Yes

☒ No

Describe why your organisation has not yet assessed the likelihood and impact of climate risks

We started assessing and measuring climate-related risks on the portfolio-level as of last year. But we have not yet done any assessments on the likelihood of these climate-related risks. It is difficult to construct these scenarios and their implications, because of limited data and the uncertain timing and magnitude of these effect. However, we try to utilize different tools available such as PACTA, Science-based targets and TPI (Transition Pathway Initiative) as well as research from other relevant sources.

**SG 01.8
CC**

Indicate whether the organisation publicly supports the TCFD?

- ☒ Yes
☐ No

**SG 01.9
CC**

Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.

- ☐ Yes
☒ No

Describe how and over what time frame the organisation will implement an organisation-wide strategy that manages climate-related risks and opportunities.

We notice an increasing demand on us as asset managers to look at investments more holistically. Pricing the risks of, for example, climate change is a major challenge. Partly because this is a whole new type of event that we are facing, where we have no history and past data to lean on but instead must estimate future events and their impact. In addition, climate change is systematic and its impact on the financial system global, and thus may affect different industries and companies in different ways. In addition, we often lack standardized information from the companies which do not always measure and report on their climate impact, especially if you look at the entire value chain.

But it is our intention to start and implement an organization-wide climate strategy. This process has started with using the TCFD as a foundation and framework, and we are now in the development phase of identifying goals and setting targets. Our intention is to adapt an organization-wide climate strategy in 2020.

**SG 1.10
CC**

Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.

- ☒ Public PRI Climate Transparency Report
☐ Annual financial filings
☒ Regular client reporting
☐ Member communications
☒ Other

specify

Annual climate report, based on the TCFD disclosure guidelines:
<https://www.ohman.se/fonder/rapporter/kilimatrapport/>

- ☐ We currently do not publish TCFD disclosures

SG 02

Mandatory

Public

Core Assessed

PRI 6

New selection options have been added to this indicator. Please review your prefilled responses carefully.

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

☒ URL

URL

https://www.ohman.se/wp-content/uploads/Policy_Ansvarsfulla_investeringar_20161129-1.pdf

☐ Attachment (will be made public)

☒ Formalised guidelines on environmental factors

URL/Attachment

☒ URL

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

☐ Attachment (will be made public)

☒ Formalised guidelines on social factors

URL/Attachment

☒ URL

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

☐ Attachment (will be made public)

☒ Formalised guidelines on corporate governance factors

URL/Attachment

☒ URL

	URL
--	-----

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

- ☐ Attachment (will be made public)
- ☐ Fiduciary (or equivalent) duties
- ☒ Screening / exclusions policy

	URL/Attachment
--	----------------

☒ URL

	URL
--	-----

https://www.ohman.se/wp-content/uploads/Policy_Ansvarsfulla_investeringar_20161129-1.pdf

- ☐ Attachment (will be made public)
- ☒ Engagement policy

	URL/Attachment
--	----------------

☒ URL

	URL
--	-----

<https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-5-principer-för-aktieägarengagemang-190607.pdf>

- ☐ Attachment (will be made public)
- ☒ (Proxy) voting policy

	URL/Attachment
--	----------------

☒ URL

	URL
--	-----

<https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-5-principer-för-aktieägarengagemang-190607.pdf>

- ☐ Attachment (will be made public)
- ☐ 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

URL/Attachment

☒ URL

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

☐ Attachment

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

URL/Attachment

☒ URL

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

☐ Attachment

☒ Governance structure of organisational ESG responsibilities

URL/Attachment

☒ URL

URL

https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-39-Ansvarsfulla-investeringar-policy_190827.pdf

☐ Attachment

☒ ESG incorporation approaches

URL/Attachment

☒ URL

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

☐ Attachment

☒ Active ownership approaches

URL/Attachment

☒ URL

	URL
--	-----

<https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-5.1-Interna-regler-för-aktieägarengagemang-190607.pdf>

- ☐ Attachment
- ☐ Understanding and incorporating client / beneficiary sustainability preferences
- ☐ We do not publicly disclose any investment policy components

SG 03	Mandatory	Public	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.
----------------	---

Öhman Fonder AB has an obligation to identify the conflicts of interest that may arise in the business. For example, between the company and its customers or between different customers in connection with the company providing services. The company also has an obligation to prevent customers' interests being adversely affected by conflicts of interest.

Öhman Fonder AB has adopted guidelines for managing conflicts of interest. The guidelines aim to prevent conflicts of interest arising and, if a conflict still arises, to prevent a negative impact on the customers' interests. The guidelines describe potential conflicts of interest and what measures are taken to prevent such negative impact. The guidelines state among other things: how a sufficient degree of independence can be achieved in order to avoid, as far as possible, conflicts of interest between different departments, units and sub-units within the company and the Öhman Group and how any potential conflicts of interest should be handled

<https://www.ohman.se/om-oss/vara-bolag/ohman-fonder/legal-information/intressekonflikter/>

☐ No

SG 04	Voluntary	Public	Descriptive	General
-------	-----------	--------	-------------	---------

SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.
----------------	---

☒ Yes

☐ No

SG 04.2	Describe your process on managing incidents
----------------	---

Our risk monitor combines inputs from our own company meetings with ratings, ratings and data points from a number of the most reputable external analysis providers to identify companies with increased sustainability risks that require more in-depth analysis to assess the material effects of these risks.

If it comes to our knowledge that one of the companies we are invested in is involved in a serious incident or activity that may violate our policy, we shall establish contact with the company. After the company has been contacted and the company's responsibility is investigated, decisions are made as possible action.

Through systematic and ongoing monitoring of the companies in our investment universe, we receive information about companies that are considered to be involved in violations of international conventions and standards. The surveillance takes place around the clock and covers more than 20,000 sources internationally. In cases where it is found that the company, systematically and extensively, violates international conventions, we begin a dialogue with the company concerned. The aim of the dialogue is that the company shall: - cease the breach of the convention -

compensate people and the environment that has been affected by the breach of the Convention - take the necessary measures to reduce the risk that similar breaches of the Convention will be repeated in the future.

Objectives and strategies				
SG 05	Mandatory	Public	Gateway/Core Assessed	General

SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
----------------	---

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc basis
- ☐ It is not set/reviewed

SG 05.2	Additional information. [Optional]
----------------	------------------------------------

The ESG-team reports to Öhman Fonders CEO. The team together with CEO set the objectives and strategies for each year.

SG 06	Voluntary	Public	Descriptive	General
-------	-----------	--------	-------------	---------

SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.
----------------	--

	Responsible investment processes
--	----------------------------------

- ☒ Provide training on ESG incorporation

	Key performance indicator
--	---------------------------

Internal education and lecturers with external guests.

	Progress achieved
--	-------------------

During 2019 we have had 3 educational session internally.

- ☐ Provide training on ESG engagement
- ☒ Improved communication of ESG activities within the organisation

	Key performance indicator
--	---------------------------

Develop an ESG Risk-monitor in our database accessible for all fund managers

Progress achieved

The work was completed in December

- ☐ Improved engagement to encourage change with regards to management of ESG issues
- ☒ Improved ESG incorporation into investment decision making processes

Key performance indicator

Increase AUM with ESG-analysis integrated. Develop methodology for all asset classes

Progress achieved

By mid 2019 100% of our AUM have ESG-analysis integrated.
All fund now have a methodology to integrate ESG-risk analysis

- ☒ Other, specify (1)
Develop sector-specific ESG guidelines.

Key performance indicator

Published reports.

Progress achieved

During 2019 Öhman published two sector-reports.

- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

Financial performance of investments

- ☐ Increase portfolio performance by consideration of ESG factors
- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

	ESG characteristics of investments
--	------------------------------------

- ☐ Over or underweight companies based on ESG characteristics
- ☐ Improve ESG ratings of portfolio
- ☐ Setting carbon reduction targets for portfolio
- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

	Other activities
--	------------------

- ☐ Joining and/or participation in RI initiatives
- ☐ Encouraging others to join a RI initiative
- ☐ Documentation of best practice case studies
- ☒ Using case studies to demonstrate engagement and ESG incorporation to clients

	Key performance indicator
--	---------------------------

Publish sector-specific reports.

	Progress achieved
--	-------------------

During 2019 Öhman published two sector-specific reports.

- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

Governance and human resources				
--------------------------------	--	--	--	--

SG 07	Mandatory	Public	Core Assessed	General
-------	-----------	--------	---------------	---------

SG 07.1	Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.
----------------	---

	Roles
--	-------

- ☒ Board members or trustees
 - ☒ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Internal Roles (triggers other options)

Select from the below internal roles

- ☒ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), 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 responsible investment**
 - ☒ 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
- ☐ Investment analysts
- ☒ Dedicated responsible investment staff
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Investor relations
- ☒ Other role, specify (1)

Other description (1)

Committee for responsible investment

- ☒ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Other role, specify (2)
- ☐ External managers or service providers

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Board of Directors

The policy is established by the Board of Directors of Öhman Fonder. The policy must be established and approved at least once a year even if no changes are decided.

The committee for responsible investment

The Responsible Investment Committee consists of representatives of various parts of the organization and is led by the CEO. The committee is responsible for the implementation of the policy and the development of Öhman's work with responsible investments. The committee decides on overall positions, for example regarding the view of controversial activities in the companies, and about which companies should be subject to special dialogue. The Committee may also decide on the exclusion of companies from the funds.

CEO

Responsible for updating this policy is the CEO or the person appointed by the CEO.

Investment Manager

The Investment Manager is responsible for ensuring that the policy is integrated into the respective fund's investment instructions and thus is completed in the administration.

Head of Responsible Investments

The head of responsible investment is responsible for the implementation of the policy and investment instructions in the management process. The head of responsible investments must submit a report to the board annually.

SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
----------------	--

	Number
--	--------

2

SG 07 CC	Mandatory to Report Voluntary to Disclose	Public	Descriptive	General
-----------------	--	---------------	--------------------	----------------

SG 07.5 CC	Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.
-------------------	---

	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), Chief Risk Officer (CRO), 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 heads of departments
--	---

- ☒ 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

	Dedicated responsible investment staff
--	--

- ☐ Oversight/accountability for climate-related issues
- ☒ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

	Other role, specify (1)
--	-------------------------

Committee for responsible investment

- ☒ Oversight/accountability for climate-related issues
- ☐ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

SG 07.6 CC	For board-level roles that have climate-related issue oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.
-----------------------	--

The board has adopted the Policy on Responsible Investment. This policy is reviewed at least once a year. The policy includes specific climate criterias. The board also gets a presentation at least once a year on how the policy has been implemented. They are regularly informed by the CEO on the development and asked for feedback.

SG 08	Voluntary	Public	Additional Assessed	General
-------	-----------	--------	---------------------	---------

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
--	---------------------------------

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☐ Responsible investment included in personal development and/or training plan
- ☒ None of the above

	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
--	--

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Other C-level staff or head of department
--	---

Head of responsible investment

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Portfolio managers
--	--------------------

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Dedicated responsible investment staff
--	--

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Other role (1) [from SG 07]

Committee for responsible investment

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☐ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☒ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☐ Responsible investment included in personal development and/or training plan
- ☒ None of the above

SG 08.3	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.
----------------	---

Members of Committee for responsible investment have RI criteria in their individual roles as CEO, CIO etc, but specifically as members in the committee.

Promoting responsible investment

SG 09	Mandatory	Public	Core Assessed	PRI 4,5
--------------	------------------	---------------	----------------------	----------------

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.
----------------	---

Select all that apply

- ☒ Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman participate in PRI credit ratings initiative and hold a seat in the advisory committee.

Öhman is on a regular basis support initiatives launched in PRI Collaborative Platform.

Öhman is participating in two different working groups: sustainable palm oil and responsible sourcing of cobalt.

In 2019 Öhman launched an initiative in the collaborative platform - Investor support for engaging with Amazon on human rights.

- ☐ Asian Corporate Governance Association
- ☐ Australian Council of Superannuation Investors
- ☐ AVCA: Sustainability Committee
- ☐ France Invest – La Commission ESG
- ☐ BVCA – Responsible Investment Advisory Board
- ☐ CDP Climate Change
- ☐ CDP Forests
- ☐ CDP Water
- ☐ CFA Institute Centre for Financial Market Integrity
- ☒ Climate Action 100+

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman is co-lead on two company engagements and supporting investor on numerous other engagement cases. During 2019 Öhman arranged a webinar for investors in the Climate Action 100+ metals and mining group to listen to SSAB plan for a fossil free steel production.

- ☐ Code for Responsible Investment in SA (CRISA)
- ☐ Council of Institutional Investors (CII)
- ☐ Eumedion
- ☐ Extractive Industries Transparency Initiative (EITI)
- ☐ ESG Research Australia
- ☐ Invest Europe Responsible Investment Roundtable
- ☐ Global Investors Governance Network (GIGN)
- ☐ Global Impact Investing Network (GIIN)
- ☐ Global Real Estate Sustainability Benchmark (GRESB)
- ☒ Green Bond Principles

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
- ☒ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman is a member since August 2016 and active in one of the working groups.

- ☐ HKVCA: ESG Committee
- ☒ Institutional Investors Group on Climate Change (IIGCC)

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
- ☒ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

We are active participants of IIGCC, including being active members of their Corporate Engagement Group which is coordinating investor engagement and decision-making on climate risk related to listed equity and corporate debt.

- ☐ Interfaith Center on Corporate Responsibility (ICCR)
- ☐ International Corporate Governance Network (ICGN)
- ☐ 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 Financial Action in the 21st Century
- ☐ 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
- ☒ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman Fonders Head of Responsible Investment was member of Swesif board until may 2019. During 2019 Öhman actively contributed to a report about short termism in the financial markets, published by Swesif. Öhman is occasionally supporting Swesif with arranging events.

- ☐ 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
- ☒ Other collaborative organisation/initiative, specify

Portfolio Decarbonization Coalition

Your organisation's role in the initiative during the reporting year (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman is a member since may 2016.

- ☒ Other collaborative organisation/initiative, specify

Accesss to Medicine Index

Your organisation's role in the initiative during the reporting year (see definitions)

- ☐ Basic
☒ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman is lead investor for one of the companies included in Access to Medicine Index.

- ☒ Other collaborative organisation/initiative, specify

Montreal Pledge

Your organisation's role in the initiative during the reporting year (see definitions)

- ☒ Basic
☐ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Öhman was one of the first asset managers in Sweden signing the Montreall Pledge. We are annually publishing the carbon footprint from our equity funds.

- ☒ Other collaborative organisation/initiative, specify

Investor Alliance on Human Rights

Your organisation's role in the initiative during the reporting year (see definitions)

- ☐ Basic
☐ Moderate
☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

We are active participant of Investor Alliance on Human Rights. Öhman is co-lead investor on several companies which which the Alliance is engaging. Öhman is also supporting IAHR with their european outreach.

SG 10	Mandatory	Public	Core Assessed	PRI 4
-------	-----------	--------	---------------	-------

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.)

	Description
--	-------------

During 2019 we tried to new concept with our clients. It was a workshop on responsible investment with a small group of institutional investors.

	Frequency of contribution
--	---------------------------

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☒ Ad hoc
- ☐ Other

- ☐ Provided financial support for academic or industry research on responsible investment
- ☒ Provided input and/or collaborated with academia on RI related work

	Description
--	-------------

Öhman on a regular basis participate in student interviews. Annually Öhmans head of responsible investment holds a lecture on different universities.

	Frequency of contribution
--	---------------------------

- ☐ 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
--	-------------

Öhman är aktiv i den Svenska Investeringsfunds Associationen och aktivt deltar i flera arbetsgrupper.

Öhman är på en regelbunden basis stödjande olika investerars initiativ som syftar till att öka transparensen på olika materiala ämnen. 9

	Frequency of contribution
--	---------------------------

- ☒ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other

☒ Spoke publicly at events and conferences to promote responsible investment

	Description
--	-------------

Under 2019 deltog representanter från Öhman på flera konferenser som handlade om ansvarig investering.

	Frequency of contribution
--	---------------------------

- ☐ Quarterly or more frequently
- ☒ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other

☒ Wrote and published in-house research papers on responsible investment

	Description
--	-------------

Öhman är på en regelbunden basis producerar sektorspecifika ESG-forskningspapper. Under 2019 producerade och publicerade vi två utgåvor, en om banker och en om ICT.

Frequency of contribution

- ☐ Quarterly or more frequently
- ☒ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other
- ☐ 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

Öhman is occasionally writing op ed articles in local media.

Frequency of contribution

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☒ Ad hoc
- ☐ Other
- ☒ A member of PRI advisory committees/ working groups, specify

Description

Öhman participate in several working groups - ESG in credit ratings, sustainable palm oil and responsible sourcing of cobalt.

Frequency of contribution

- ☒ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other
- ☐ On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- ☐ Other, specify
- ☐ No

SG 11	Voluntary	Public	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.
----------------	---

☒ Yes

	If yes
--	--------

- ☐ Yes, individually
- ☒ Yes, in collaboration with others

SG 11.2	Select the methods you have used.
----------------	-----------------------------------

- ☒ Endorsed written submissions to governments, regulators or public policy-makers developed by others
- ☐ Drafted your own written submissions to governments, regulators or public-policy markers
- ☒ Participated in face-to-face meetings with government members or officials to discuss policy
- ☐ 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.
----------------	--

- ☐ Yes, publicly available
- ☒ No
- ☐ No

SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.
----------------	--

At different occasions Öhman has provided feedback on the taxonomy and sustainable finance act.

Outsourcing to fiduciary managers and investment consultants

SG 12	Mandatory	Public	Core Assessed	PRI 4
--------------	------------------	---------------	----------------------	--------------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1	Indicate whether your organisation uses investment consultants.
----------------	---

- ☐ Yes, we use investment consultants
- ☒ No, we do not use investment consultants.

ESG issues in asset allocation

SG 13	Mandatory	Public	Descriptive	PRI 1
--------------	------------------	---------------	--------------------	--------------

SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
----------------	--

- ☐ Yes, in order to assess future ESG factors
- ☒ Yes, in order to assess future climate-related risks and opportunities

	Describe
--	----------

Öhmans strategy to implement the TCFD recommendations includes conducting climate-related scenario analysis consistent with the recommendations. This will enable us to better anticipate and manage climate risks, as well as identify climate-related opportunities. Öhman is using PACTA to conduct scenario.

- ☐ No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
----------------	---

	We do the following
--	---------------------

- ☐ Allocation between asset classes
- ☐ Determining fixed income duration
- ☐ Allocation of assets between geographic markets
- ☒ Sector weightings
- ☐ Other, specify
- ☐ We do not consider ESG issues in strategic asset allocation

SG 13.3	Additional information. [OPTIONAL]
----------------	------------------------------------

Öhman is excluding certain sector for our investable universe, since it is our belief that they are not aligned with a sustainable development.

SG 13 CC	Mandatory to Report Voluntary to Disclose	Public	Descriptive	General
-----------------	--	---------------	--------------------	----------------

SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans.
-------------------	--

- ☒ Initial assessment

	Describe
--	----------

Our assessment after interpreting the scenario analysis results is that the portfolio's exposure to fossil fuel extraction and electricity production is in line with SDS (Sustainable Development Scenario), that is, a restriction of the temperature increase in accordance with the Paris Agreement. We have an exclusion criterion on extraction of fossil fuels; hence this reduces our exposure to these climate-related risks in the scenario analysis.

One conclusion is that the automotive industry in general has a major transformation ahead and that current investments in the production of electric and hybrid cars do not meet what would be required to achieve the Paris Agreement. In general, we have a rather limited exposure to the automotive sector, but the exposure we have is not in line with SDS.

However, measuring this with the help of a scenario analysis also comes with certain limitations. For example, earnings are based on estimates of future investments and production. It is also based on a limited number of sectors and hence it does not give a comprehensive view.

We intend to evaluate and develop the method for calculating climate risks in the future. To date, PACTA is a good first step for estimating and assessing the risks and opportunities in our portfolio.

- ☐ Incorporation into investment analysis
- ☐ Inform active ownership
- ☐ Other

**SG 13.5
CC**

Indicate who uses this analysis.

- ☐ Board members, trustees, C-level roles, Investment Committee
- ☒ Portfolio managers
- ☒ Dedicated responsible investment staff
- ☐ External managers
- ☐ Investment consultants/actuaries
- ☐ Other

**SG 13.6
CC**

Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy.

- ☐ Yes
- ☒ No

Please explain the rationale

We have a long-term investment horizon and our goal is to evaluate all potential and relevant impacts and climate-related risks.

**SG 13.7
CC**

Indicate whether a range of climate scenarios is used.

- ☒ Analysis based on a 2°C or lower scenario
- ☐ Analysis based on an abrupt transition, consistent with the Inevitable Policy Response
- ☒ Analysis based on a 4°C or higher scenario
- ☐ No, a range is not used

**SG 13.8
CC**

Indicate the climate scenarios your organisation uses.

Provider	Scenario used	
IEA	<input checked="" type="checkbox"/> Beyond 2 Degrees Scenario (B2DS)	
IEA	<input type="checkbox"/> Energy Technology Perspectives (ETP) 2 Degrees scenario	
IEA	<input checked="" type="checkbox"/> Sustainable Development Scenario (SDS)	
IEA	<input checked="" type="checkbox"/> New Policy Scenario (NPS)	
IEA	<input checked="" type="checkbox"/> Current Policy Scenario (CPS)	
IRENA	<input type="checkbox"/> RE Map	
Greenpeace	<input type="checkbox"/> Advanced Energy [R]evolution	
Institute for Sustainable Development	<input type="checkbox"/> Deep Decarbonisation Pathway Project (DDPP)	
Bloomberg	<input type="checkbox"/> BNEF reference scenario	
IPCC	<input type="checkbox"/> Representative Concentration Pathway (RCP) 8.5	
IPCC	<input type="checkbox"/> RPC 6	
IPCC	<input type="checkbox"/> RPC 4.5	
IPCC	<input type="checkbox"/> RPC 2.6	
Other	<input type="checkbox"/> Other (1)	
Other	<input type="checkbox"/> Other (2)	
Other	<input type="checkbox"/> Other (3)	

SG 14	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1
-------	---	--------	---------------------	-------

SG 14.1

Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- ☒ Changing demographics
- ☒ Climate change
- ☒ Resource scarcity
- ☒ Technological developments
- ☒ Other, specify(1)

other description (1)

Just transition

- ☐ Other, specify(2)
- ☐ None of the above

SG 14.2

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

Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes.

	trillions	billions	millions	thousands	hundreds
Total AUM		3	500	000	000
Currency	SEK				
Assets in USD			365	718	060

Specify the framework or taxonomy used.

Öhman has invested 3,5 billion SEK into green bonds.

- ☒ Phase out your investments in your fossil fuel holdings
- ☒ 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 14.3	Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.
----------------	--

- ☒ Scenario analysis
- ☒ Disclosures on emissions risks to clients/trustees/management/beneficiaries
- ☒ Climate-related targets
- ☒ Encouraging internal and/or external portfolio managers to monitor emissions risks
- ☐ 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

SG 14.4	If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.
----------------	--

Carbon footprint according to standard developed by Swedish Fund association (in line with TCFD)

SG 14 CC	Voluntary	Public		General
SG 14.6 CC	Provide further details on the key metric(s) used to assess climate-related risks and opportunities.			

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Climate-related targets	<input type="checkbox"/> All assets <input type="checkbox"/> Majority of assets <input checked="" type="checkbox"/> Minority of assets	Assess whether companies climate targets are in line with Paris agreement and below 2 degrees.	Science-based target	Science-based targets, as defined by the SBT Initiative
Carbon footprint (scope 1 and 2)	<input type="checkbox"/> All assets <input type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets			
Portfolio carbon footprint	<input type="checkbox"/> All assets <input checked="" type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets	Portfolio's exposure to carbon-intensive companies, expressed in tonnes CO ₂ e / \$M revenue	tCO ₂ e/\$M revenue	Measured for all equity portfolios, with more than 75% reported or estimated CO ₂ data
Total carbon emissions	<input type="checkbox"/> All assets <input checked="" type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets	The absolute greenhouse gas emissions associated with a portfolio, expressed in tonnes CO ₂ e.	tCO ₂ e	Reported and estimated CO ₂ emissions associated with the equity portfolio holdings
Carbon intensity	<input type="checkbox"/> All assets <input checked="" type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets	Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio), expressed in tonnes CO ₂ e / \$M revenue.	tCO ₂ e/\$M revenue	Measured for all equity portfolios, with more than 75% reported or estimated CO ₂ data
Exposure to carbon-related assets	<input type="checkbox"/> All assets <input type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets			

SG 14.7
CC

Describe in further detail the key targets.

Targettype	Baseline year	Target year	Description	Attachments
<input type="checkbox"/> Absolute target <input type="checkbox"/> Intensity target				
<input type="checkbox"/> Absolute target <input type="checkbox"/> Intensity target				
<input type="checkbox"/> Absolute target <input type="checkbox"/> Intensity target				
<input type="checkbox"/> Absolute target <input type="checkbox"/> Intensity target				
<input type="checkbox"/> Absolute target <input type="checkbox"/> Intensity target				

**SG 14.8
CC**

Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

- ☐ Processes for climate-related risks are integrated into overall risk management
- ☒ Processes for climate-related risks are not integrated into overall risk management

Please describe

Not integrated into overall risk management, this has yet to be more formally integrated. We are working to increase the overall competence and understanding of climate-related risks within the organisation.

**SG 14.9
CC**

Indicate whether your organisation, and/or external investment manager or service providers acting on your behalf, undertake active ownership activities to encourage TCFD adoption.

- ☒ Yes

Please describe

We undertake active ownership to encourage TCFD adoption, for example as lead investors for some of the engagement dialogues within Climate Action 100+.

- ☐ No, we do not undertake active ownership activities.
- ☐ No, we do not undertake active ownership activities to encourage TCFD adoption.

SG 15

Mandatory to Report Voluntary to Disclose

Public

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

SG 15.2

Indicate the percentage of your total AUM invested in environmental and social themed areas.

%

3.5

SG 15.3

Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.

Area

- ☐ Energy efficiency / Clean technology
- ☐ Renewable energy
- ☐ Green buildings
- ☐ Sustainable forestry
- ☐ Sustainable agriculture
- ☐ Microfinance
- ☐ SME financing
- ☐ Social enterprise / community investing
- ☐ Affordable housing
- ☐ Education
- ☐ Global health
- ☐ Water
- ☒ Other area, specify

Green bonds

Asset class invested

- ☐ Listed equity
- ☐ Fixed income - SSA
- ☒ Fixed income - Corporate (financial)

Percentage of AUM (+/-5%) per asset class invested in the area

1

- ☒ Fixed income - Corporate (non-financial)

Percentage of AUM (+/-5%) per asset class invested in the area

10

- ☐ Fixed income - Securitised

Brief description and measures of investment

Öhman fixed income team invest in green bonds. Öhman also has a green bond fund investing in corporate green bonds

☐ No

Innovation

SG 18	Voluntary	Public	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.
---------	---

Stockholm Green Digital Finance, together with the asset manager Öhman and others, in 2018 launched the development a block chain technology to help investors measure and ensure the impact of green bonds. Block chain technology can stimulate the green investment market through cost-effective technology that enables investors to directly verify and monitor their green investments.

The technology will help to scale up the market for green investments, partly by reducing the costs for issuers and increasing the supply, and partly by enabling investors to be able to enter more difficult markets where the needs are greatest to deliver on the global sustainability goals.

There is a great need for investors in green bonds to ensure that green money goes to financing environmentally friendly projects and delivering promised environmental benefits. The new technology will create the reliability of environmental certification many investors lack in order to dare to take the step of investing green.

The outcome of the development project was Green Asset Wallet that was launched in 2019.

☐ No

Communication

SG 19	Mandatory	Public	Core Assessed	PRI 2, 6
-------	-----------	--------	---------------	----------

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

Listed equity - Incorporation

Do you disclose?

- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries
- ☐ We disclose to clients/beneficiaries only.
- ☒ We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- ☒ Yes
- ☐ No

Disclosure to public and URL

Disclosure to public and URL

- ☐ Broad approach to ESG incorporation
- ☒ Detailed explanation of ESG incorporation strategy used

Frequency

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc/when requested

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

URL

https://www.ohman.se/wp-content/uploads/IB_Ohman_Fonder.pdf

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

Frequency

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc/when requested

URL

<https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/>

URL

<https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-5.1-Interna-regler-för-aktieägarengagemang-190607.pdf>

Listed equity – (Proxy) Voting

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

Disclosure to clients/beneficiaries

Disclosure to clients/beneficiaries

- ☐ Disclose all voting decisions
- ☐ Disclose some voting decisions
- ☒ Only disclose abstentions and votes against management

Frequency

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc/when requested

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	
	<div>Disclosure to public and URL</div> <div> <input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used </div>
	<div>Frequency</div> <div> <input type="checkbox"/> Quarterly <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc/when requested </div>
	<div>URL</div> <div> https://www.ohman.se/ansvarsfulla-investeringar/sa-foljer-du-vart-arbete/ </div>
	<div>URL</div> <div> https://www.ohman.se/wp-content/uploads/IB_Ohman_Fonder.pdf </div>

SG 19.2	Additional information [Optional]
	<ul style="list-style-type: none"> • Publish annual report on "Active Ownership" - including extensive information on our engagements: https://www.ohman.se/wp-content/uploads/Öhman_Fonder_Ansvarsfullt-ägande-2018_Webb.pdf • Publicly disclose sector-specific ESG reports: https://www.ohman.se/wp-content/uploads/Öhman_Prospektiv_Hållbarhetsrisker_inom_teknologisektorn_2019_1-1.pdf • Information on ESG strategies is included in the funds information documents: https://www.ohman.se/wp-content/uploads/IB_Ohman_Fonder.pdf • Information on ESG strategies is included in the funds annual report: https://www.ohman.se/wp-content/uploads/IB_Ohman_Fonder.pdf • Information on ESG strategies for all funds available at the publicly available website Hållbarhetsprofilen: https://hallbarhetsprofilen.se/index.html • Publicly disclose our PRI-reporting (including our RI incorporation strategies used).

Ohman

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

ESG incorporation in actively managed listed equities

Implementation processes

LEI 01	Mandatory	Public	Gateway	PRI 1
--------	-----------	--------	---------	-------

LEI 01.1

Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.

ESG incorporation strategy (select all that apply)

- ☐ Screening alone (i.e., not combined with any other strategies)
- ☐ Thematic alone (i.e., not combined with any other strategies)
- ☐ Integration alone (i.e., not combined with any other strategies)
- ☒ Screening and integration strategies

Percentage of active listed equity to which the strategy is applied — you may estimate +/- 5%	<div> <div></div> <div>%</div> </div> <div>100</div>
---	--

- ☐ Thematic and integration strategies
- ☐ Screening and thematic strategies
- ☐ All three strategies combined
- ☐ We do not apply incorporation strategies

Total actively managed listed equities

100%

LEI 01.2

Describe your organisation's approach to ESG incorporation and the reasons for choosing the particular strategy/strategies.

It is our firm belief that ESG considerations is essential in order to be able to assess the risks and opportunities which could impact a company both in the short- and long-term. For this reason, we have decided to take a systematic approach to ESG incorporation. Integrating ESG factors into the investment process contributes to better risk management and mitigation, and is a strategy to capture greater investment opportunities and long-term growth trends. As of this year, all of our funds are managed according to our highest sustainability level (ESG integration). Each investment team determines how the sustainability factors are material to the investment, depending on their investment strategy, universe and mandate.

We only invest in companies that live up to our high standards for sustainable business conduct. Hence, we exclude companies that according to our criterias are engaged in unethical behavior or are in breach of international norms and conventions. We do so by conducting quarterly screenings, to ensure that our investments are compliant with our standards and client demands.

ESG integration strategy:

- If it is a new company which have not been assessed before: portfolio manager inform the ESG team. An ESG Due Diligence is conducted to ensure that it meets our minimum requirements.

- The ESG team makes a qualitative assessment of the company's ESG profile and gives a recommendation/ESG outlook (**positive / neutral / negative outlook**). The ESG score from the external service provider, which is a more quantitative score (ESG risk rating), is thus complemented by our own internal and qualitative assessment. The company's ESG profile is taken into account in the fundamental analysis and could hence impact the valuation and investment decision.
- We also apply a thematic strategy, to identify specific investment themes and value drivers. We strive to invest in companies that, due to their exposure to certain themes or specific Sustainable Development Goals (SDG), are deemed to have the potential to increase their long-term growth opportunities.
- We have developed an *ESG Risk Monitor*, to identify portfolio holdings with high or heightened ESG risk, or companies with an improving ESG profile. The results from the monitoring process is discussed at regular meetings with the portfolio management teams.
- If a company has been identified as having high ESG risk, and if the ESG team has a **negative outlook** for the company, this is discussed at the regular meetings. If we continue to have a negative view of the company's ESG profile, and do not see the necessary improvements from engagement, we can choose to divest.

LEI 01.3

If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

Screening is the foundation of our responsible investment strategy and is applicable to all of our investments. This strategy was chosen to meet client demands as well as regulatory requirements, but also because certain business practices simply are misaligned with a sustainable development and hence not something we deem is a good investment. A quarterly screening is conducted of the investment universe to ensure compliance with our criterias. An investment is not eligible if the company violates our exclusion criteria or if it is verified for violating international norms and conventions.

ESG integration:

Actively managed funds: see ESG incorporation strategy above (LEI 01.2). ESG integration strategy applied to enhance the investment decision making process, to widen the scope of factors we evaluate when considering an investment.

Passively managed funds: the more sustainable companies are assigned a higher weight in the fund than in the benchmark index.

LEI 02	Voluntary	Public	Additional Assessed	PRI 1
--------	-----------	--------	---------------------	-------

LEI 02.1

Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

Type of ESG information

- ☒ Raw ESG company data

Indicate who provides this information

- ☒ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Company-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☒ In-house – analyst or portfolio manager
- ☒ Sector-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☐ Country-related analysis or ratings
- ☒ Screened stock list

Indicate who provides this information

- ☒ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ ESG issue-specific analysis or ratings

Indicate who provides this information

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

LEI 02.2

Indicate whether you incentivise brokers to provide ESG research.

☒ Yes

LEI 02.3

Describe how you incentivise brokers.

In our assessment of counterparties and in the annual broker vote, we evaluate to what extent they deliver ESG research and the quality and scope of these. In meetings with brokers we always encourage their ESG efforts and give feedback on improvements.

☐ No

LEI 03

Voluntary

Public

Additional Assessed

PRI 1

LEI 03.1	Indicate whether 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

LEI 03.2	Additional information. [Optional]
-----------------	------------------------------------

We have an ESG research log (centralized front-desk system), where ESG analysts add company-specific research notes, for example after company presentations and meetings. We also flag whether the company is subject to an ongoing engagement.

The portfolio managers always have access to this log, but the ESG-team also send ESG-updates to relevant teams when a change is made; including a short comment, the company's ESG risk profile and ESG outlook. Through these updates we notify portfolio managers about the engagement process and potential changes in our assessment.

(A) Implementation: Screening

LEI 04	Mandatory	Public	Descriptive	PRI 1
---------------	------------------	---------------	--------------------	--------------

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

Type of screening

☒ Negative/exclusionary screening

Screened by

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

	Description
--	-------------

Quarterly screening is conducted by an external service provider based on our ethical standard as well as international norms and conventions. **For all actively managed listed equity** we exclude companies that are producing and distributing controversial weapons; cluster munitions, anti-personnel mines, nuclear-, biological- and chemical weapons. We also exclude companies if more than 0% of their revenues are derived from **production** of weapons/military material, tobacco and pornography. Also, companies involved in **distribution** of alcohol, weapons/military material, gambling, tobacco, pornography and cannabis (more than 5% of their revenues) are excluded. We do not invest in companies involved in extraction of fossil fuels (coal, oil and gas) or companies which derive more than 10% of their revenues from coal-based electricity and oil and gas-services.

- ☐ Positive/best-in-class screening
- ☒ Norms-based screening

Screened by

- ☒ 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
--	-------------

Quarterly screening is conducted by an external service provider on the basis of international norms and conventions. If a company is found to be a confirmed violation, we exclude the company from the investment universe. We do not invest in companies that systematically are in breach of international norms and conventions based on UN Global Compact 10 principles on labor, human rights, environment and anti-corruption.

LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.
-----------------	--

The screening criterias are defined and set by our Committee for Responsible Investment, and decided upon by the Board of Directors. We have identified these criterias based on customer demand, industry standards and what we deem are important sustainability risks. The criteria's are evaluated once a year, and potential changes are included and revised in our policy. They are communicated to our clients in many ways, for example news letters and meetings.

LEI 05	Mandatory	Public	Core Assessed	PRI 1
---------------	------------------	---------------	----------------------	--------------

LEI 05.1

Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.

- ☒ 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.
- ☒ Trading platforms blocking / restricting flagged securities on the black list.
- ☒ A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.
- ☒ A periodic review of internal research 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.

- ☐ <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****Public****Additional Assessed****PRI 1**

LEI 06.1

Indicate which processes your organisation uses to ensure fund criteria are not breached.

- ☒ Systematic checks are performed to ensure that stocks meet the fund's 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.

The internal control function on a daily basis monitors that our clients' and fund holdings are in line with its sustainability criterias. Any deviations must immediately be reported to the responsible portfolio manager, CEO and Head of Responsible investment. The portfolio managers have to sell the holding that are in breach of the sustainability criteria. Head of Responsible Investment must annually report to the Board of Directors on the selection process and its compliance.

(C) Implementation: Integration of ESG factors**LEI 08****Mandatory****Public****Core Assessed****PRI 1****LEI 08.1**

Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.

ESG issues	Proportion impacted by analysis
Environmental	<div> <div></div> <div>Environmental</div> </div> <p> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90% </p>
Social	<div> <div></div> <div>Social</div> </div> <p> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90% </p>
Corporate Governance	<div> <div></div> <div>Corporate Governance</div> </div> <p> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90% </p>

LEI 09	Mandatory	Public	Core Assessed	PRI 1
--------	-----------	--------	---------------	-------

LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.
----------	--

- ☒ 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
- ☒ Third-party ESG ratings are updated regularly
- ☒ A periodic review of the internal research is carried out
- ☒ Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ☒ ESG risk profile of a portfolio against benchmark
- ☐ Analysis of the impact of ESG factors on investment risk and return performance
- ☐ Other; specify
- ☐ None of the above

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.

- ☐ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☒ >90%

LEI 09.3

Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

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

LEI 09.4

Indicate how frequently you review internal research that builds your ESG integration strategy.

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

LEI 09.5

Describe how ESG information is held and used by your portfolio managers.

- ☒ ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ☒ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- ☒ Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- ☐ Other; specify
- ☐ None of the above

LEI 09.6

Additional information. [Optional]

We have an ESG research log, where ESG analysts add company-specific research notes for example after company presentations and meetings. We also flag whether the company is subject to an ongoing engagement.

The portfolio managers always have access to this log, but the ESG-team also send ESG-updates to relevant teams when a change is made; these updates include a short comment, the company's ESG score and the ESG outlook. Through these updates the ESG-team notify portfolio managers about the engagement process and potential changes in our assessment.

LEI 10	Mandatory to Report Voluntary to Disclose	Public	Core Assessed	PRI 1
--------	---	--------	---------------	-------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEI 10.1

Indicate which aspects of investment analysis you integrate material ESG information into.

☒ Economic analysis

Proportion of actively managed listed equity exposed to investment analysis

- ☐ <10%
- ☐ 10-50%
- ☒ 51-90%
- ☐ >90%

☒ Industry analysis

Proportion of actively managed listed equity exposed to investment analysis

- ☐ <10%
- ☐ 10-50%
- ☒ 51-90%
- ☐ >90%

☒ Quality of management

Proportion of actively managed listed equity exposed to investment analysis

- ☐ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☒ >90%

☒ Analysis of company strategy

Proportion of actively managed listed equity exposed to investment analysis

- ☐ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☒ >90%

☐ Portfolio weighting☒ Security sensitivity and/or scenario analysis

Proportion of actively managed listed equity exposed to investment analysis

- ☐ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☒ >90%

☐ Fair value/fundamental analysis☐ Other; specify

LEI 10.5

Describe how you apply sensitivity and /or scenario analysis to security valuations.

We have conducted a scenario-analysis using the PACTA-tool, created by 2-degrees Investing and supported by the UNPRI. We have conducted this analysis on our listed equity portfolio, and the results have been published in our annual climate report (aligned with TCFD), which can be found here: <https://www.ohman.se/fonder/rapporter/kilimatrapport/>

LEI 10.6

Additional information. [OPTIONAL]

During 2019 we have developed a sector-specific ESG research conducted in house. We look further into the material ESG aspect within a sector and highlight what we see as the main risks but also drivers going forward. This complements our industry analysis above, and assess how political, regulatory and ESG factors could affect an industry.

- The first sector report covered the Tech sector and issues such as data privacy and integrity: https://www.ohman.se/wp-content/uploads/Öhman_Prospektiv_Hållbarhetsrisker_inom_teknologisektorn_2019_1-1.pdf
- The second sector report covered the Banking sector, especially focusing on climate-related financial risks and business ethics: https://www.ohman.se/wp-content/uploads/Öhman_Prospektiv_2_2019.pdf

These reports are both used as a foundation for discussion on these topics with the portfolio managers. But also in discussions with our clients and other stakeholders. We will soon publish our third sector report, focusing on Industrials.

ESG incorporation in passively managed listed equities**LEI 11****Mandatory to Report Voluntary to Disclose****Public****Descriptive****PRI 1****LEI 11.1**

Indicate if you manage passive listed equity funds that incorporate ESG factors in the index construction methodology.

- ☒ Yes
☐ No

LEI 11.2

Indicate the percentage of your total passive listed equity funds for which ESG factors are incorporated in the index construction methodology.

ESG incorporation in index construction methodology (% of total passive listed equity funds)

- ☐ <10%
☐ 10-50%
☐ 51-90%
☒ >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.

☒ Index/fund 1

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
<p>Öhman Sverige Marknad Hållbar:</p> <p>Firstly, we apply the exclusionary criteria. Secondly, a sustainability analysis is conducted which leads to a percentage ranking of the companies. The fund invest in the 75 percent of the companies with lowest ESG risk, compared to the benchmark. These companies are assigned a proportionally larger weight in the fund compared to the benchmark index.</p>	<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Thematic</p> <p><input checked="" type="checkbox"/> Integration of ESG factors</p> <p><input type="checkbox"/> Other</p>

☒ Index/fund 2

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
<p>Öhman Global Marknad Hållbar:</p> <p>Firstly, we apply the exclusionary criteria. Secondly, a sustainability analysis is conducted which leads to a percentage ranking of the companies within each sector and region. The fund invest in the 50 percent of the companies with lowest ESG risk, compared to the benchmark. These companies are assigned a proportionally larger weight in the fund compared to the benchmark index.</p>	<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Thematic</p> <p><input checked="" type="checkbox"/> Integration of ESG factors</p> <p><input type="checkbox"/> Other</p>

☒ Index/fund 3

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
<p>Öhman Etisk Index Emerging Markets:</p> <p>Firstly, we apply the exclusionary criteria. Secondly, a sustainability analysis is conducted which leads to a percentage ranking of the companies within each sector. The fund invest in the 75 percent of the companies with lowest ESG risk, compared to the benchmark. These companies are assigned a proportionally larger weight in the fund compared to the benchmark index.</p>	<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Thematic</p> <p><input checked="" type="checkbox"/> Integration of ESG factors</p> <p><input type="checkbox"/> Other</p>

☒ Index/fund 4

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
Öhman Etisk Index Europa: Firstly, we apply the exclusionary criteria. Secondly, a sustainability analysis is conducted which leads to a percentage ranking of the companies within each sector. The fund invest in the 75 percent of the companies with lowest ESG risk, compared to the benchmark. These companies are assigned a proportionally larger weight in the fund compared to the benchmark index.	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG factors <input type="checkbox"/> Other

☒ Index/fund 5

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
Öhman Etisk Index Sverige: Firstly, we apply the exclusionary criteria. Secondly, a sustainability analysis is conducted which leads to a percentage ranking of the companies. The fund invest in the 75 percent of the companies with lowest ESG risk, compared to the benchmark. These companies are assigned a proportionally larger weight in the fund compared to the benchmark index.	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG factors <input type="checkbox"/> Other

LEI 11.4	Additional information. [Optional]
----------	------------------------------------

For the Global index funds the sustainability analysis is done within both sectors and regions and the fund selects the 50 percent out of all the companies in the benchmark index with the lowest sustainability risk. For the Swedish index funds, the sustainability analysis and percentage ranking is done for all companies in the benchmark index without regard to sectors.

Outputs and outcomes

LEI 12	Voluntary	Public	Descriptive	PRI 1
--------	-----------	--------	-------------	-------

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.

For all of our funds, both actively and passively managed, we apply our exclusionary screening criteria which reduce the investment universe, but to a varying extent depending on each funds specific investment universe and strategy. The reduced universe ranges from 5-25% (Swedish market), but to a larger extent globally, 25-50%, of the market value for some of the funds. See more in additional information (LEI 12.2).

Specify the percentage reduction (+/- 5%)

	%
--	---

25

☒ Integration of ESG factors

	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
- ☒ Engagement / Voting
- ☐ Other; specify
- ☐ None of the above

☒ Index incorporating ESG factors (for passively managed funds)

	Describe the influence on composition or other effects.
--	---

See additional information (LEI 12.2) below.

LEI 12.2	Additional information.[Optional]
-----------------	-----------------------------------

Passively managed index-tracking funds (per year end 2019):

- **Etisk Index Sverige.**Excluded market value; 25%.
Fund aggregate ESG risk 20 / 100 (compared to index: 21 / 100).
ESG performance attribution: -1.10%
-
- **Etisk Index USA.**Excluded market value; 38%.
Fund aggregate ESG risk 21 / 100 (compared to index: 24 / 100).
ESG performance attribution: +0.78%
-
- **Etisk Index Europa.**Excluded market value; 44%.
Fund aggregate ESG risk 20 / 100 (compared to index: 24 / 100).
ESG performance attribution: +1.77%
-
- **Etisk Index Japan.**Excluded market value; 35%.
Fund aggregate ESG risk 22 / 100 (compared to index: 25 / 100).
ESG performance attribution: +2.17%
-
- **Etisk Index Pacific.**Share of excluded market value; 41%.
Fund aggregate ESG risk 21 / 100 (compared to index: 24 / 100).
ESG performance attribution: +2.93%
-
- **Sverige Marknad Hållbar**Share of excluded market value; 25%.
Fund aggregate ESG risk 20 / 100 (compared to index: 21 / 100).
ESG performance attribution: -1.00%
-

- **Global Marknad Hållbar.** Share of excluded market value; 56%
- Fund aggregate ESG risk 19 / 100 (compared to index: 24 / 100).
- ESG performance attribution: +2.35%
-
- **Etisk Emerging Markets.** Share of excluded market value; 40%
- Fund aggregate ESG risk 25 / 100 (compared to index: 28 / 100).
- ESG performance attribution: +4.83%
-

These numbers are publicly reported each month: <https://www.ohman.se/fonder/manadsblad/aktiefonder-som-forvaltas-indexnara/>

LEI 13	Voluntary	Public	Descriptive	PRI 1
--------	-----------	--------	-------------	-------

LEI 13.1	Provide examples of ESG factors that affected your investment view and/or performance during the reporting year.
----------	--

☒ ESG factor 1

	ESG factor and explanation
E, S & G	
	ESG incorporation strategy applied
Screening, Index incorporating ESG factors <input checked="" type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Index incorporating ESG factors	
	Impact on investment decision or performance
<p>During the year, most of our passively managed funds' sustainability profile yielded a strong positive contribution compared to index. If we break down the sustainability contribution per criterion, we can see that large contribution comes from overweight in sustainable companies but exclusion of companies with high ESG risk also had a strong positive impact for some of the funds. The exclusion of fossil fuel companies has also contributed positively to the funds performance.</p> <p>At the company-level, the exclusion of Royal Dutch Shell and BP have for example contributed positively. Microsoft is a holding that has been overweighted and contributed to lowering ESG risk.</p>	

☒ ESG factor 2

	ESG factor and explanation
(S): Working conditions	
	ESG incorporation strategy applied
Screening, Integration <input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Index incorporating ESG factors	
	Impact on investment decision or performance
<p>We decided to not participate in the Uber IPO. In the last three years, the company has spent a total of 10 billion dollars and wrote in their prospectus that there is a risk that the company never becomes profitable. However, it was not mainly the high valuation and the unprofitable business that led us to make the decision to not invest. The company has also been criticized for underpaying drivers who are not regarded as employees but as freelancing drivers. Uber also has a number of outstanding disputes with authorities, for example the US Department of Justice launched a criminal investigation. This investigation also includes a case that Uber customer data was available to third parties. Uber has a high ESG risk and was almost immediately placed on the watchlist for violating international norms and conventions. More on our decision to not participate in the IPO was communicated externally and can be found here: https://www.ohman.se/nyheter/2019/19107/</p>	

☒ ESG factor 3

	ESG factor and explanation
(E): Environmental, emission reduction from transportation	
	ESG incorporation strategy applied
Thematic, Integration <input type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Index incorporating ESG factors	
	Impact on investment decision or performance
We decided to invest in Trainline (thematic ESG decision). The company facilitates more environmentally friendly travelling by train through booking of electronic tickets: there is also a connection to SDG 11.2 = <i>By 2030, provide access to safe, affordable, accessible and sustainable transport systems for everyone</i> . Market outlook: expects 40% increase in train passengers in the UK. In addition, we also see political support for investments and expansion of the train network given that the UK adopted the ambitious net zero emission target to 2050 as the first G7 country. We have also been engaging with Trainline on certain ESG issues on which we believe they can improve.	

☒ ESG factor 4

	ESG factor and explanation
(E & S): Electrification and mining safety	
	ESG incorporation strategy applied
Thematic, Integration <input type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Index incorporating ESG factors	
	Impact on investment decision or performance
<p>We have invested in Lundin Mining, a company exposed to a strong mining sector where we see future automation and electrification as positive drivers. Some examples of factors strengthening our ESG investment conviction:</p> <ul style="list-style-type: none"> • We will see an increase in demand for copper in the coming years. The company will increase its copper production by over 30% from 2019 to 2021 due to the previous acquisition of Chapada in Brazil. With copper as one of their most important products, they are also exposed to the electrification trend. Sustainability: The company has operations in the US, Portugal, Chile and part-ownership in Finland, which gives a medium-high business risk. Sustainability is well integrated into their business strategy. • Lundin Mining's sustainability profile showcase good conditions for the business to run without interruptions and disruptions, and with low brand risk. Their active work in the local community contributes to a positive license to operate, which is valuable in expansion in other markets. • 	

☐ ESG factor 5

Ohman

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

LEA 01	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1

Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

☒ Yes

LEA 01.2

Attach or provide a URL to your active ownership policy.

☐ Attachment provided:

☒ URL provided:

URL

<https://www.ohman.se/ansvarsfulla-investeringar/ansvarsfullt-agande/>

LEA 01.3

Indicate what your active engagement policy covers:

General approach to Active Ownership

- ☒ Conflicts of interest
- ☒ Alignment with national stewardship code requirements
- ☒ Assets/funds covered by active ownership policy
- ☒ Expectations and objectives
- ☒ Engagement approach

Engagement

- ☒ ESG issues
- ☒ Prioritisation of engagement
- ☒ Methods of engagement
- ☒ Transparency of engagement activities
- ☒ Due diligence and monitoring process
- ☒ Insider information
- ☒ Escalation strategies
- ☐ Service Provider specific criteria
- ☐ Other; (specify)
- ☒ (Proxy) voting approach

Voting

- ☒ ESG issues
 - ☐ Prioritisation and scope of voting activities
 - ☐ Methods of voting
 - ☒ Transparency of voting activities
 - ☐ Regional voting practice approaches
 - ☐ Filing or co-filing resolutions
 - ☐ Company dialogue pre/post-vote
 - ☐ Decision-making processes
 - ☐ Securities lending processes
 - ☐ Other; (specify)
 - ☐ Other
 - ☐ None of the above
- ☐ No

LEA 01.4

Do you outsource any of your active ownership activities to service providers?

- ☒ Yes

LEA 01.5

Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:

- ☒ Outline of service provider's role in implementing your organisation's active ownership policy
 - ☒ Description of considerations included in service provider selection and agreements
 - ☒ Identification of key ESG frameworks which service providers must follow
 - ☒ Outline of information sharing requirements of service providers
 - ☒ Description of service provider monitoring processes
 - ☐ Other; (specify)
 - ☐ None of the above
- ☐ No

LEA 01.6

Additional information [optional]

Öhman invest in thousands of companies worldwide. In order to achieve the greatest possible impact, it is important that we work focused and together with other investors who share our values. The fact that investors jointly engage in advocacy towards companies has a proven effect, and at the same time is the most cost-effective.

The process of ownership control is separate from the investment process and the two parts are conducted separately.

In our corporate governance, we use two tools to influence companies:

- Influence dialogues
- attending annual general meetings

Influence dialogues are conducted with companies that are part of the fund company's entire investment universe and can be conducted regardless of whether we are invested in the companies or not.

The fund company carries out and participates in various activities and punctual initiatives with the aim of influencing companies, industry organizations and legislators to contribute to a sustainable financial market.

We work in a preventive and forward-looking manner to influence the companies to improve their internal processes and external reporting, which will lead to long-term stable financial returns.

The process of influence dialogues:

- ☐ Structured and ongoing dialogue with companies
- ☐ Working with other investors

☐ Clear and measurable goals

Influence dialogues are conducted with:

- companies that are part of one of our focus areas,
- companies that are part of our actively managed funds and where we identified reasons for dialogue.

To clarify our approach Öhman has published steering guidelines, which complements our policy.

<https://www.ohman.se/wp-content/uploads/ÖF-Bilaga-5.1-Interna-regler-för-aktieägarengagemang-190607.pdf>

Engagement

LEA 02	Mandatory	Public	Core Assessed	PRI 1,2,3
--------	-----------	--------	---------------	-----------

LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <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 it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <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 it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via service providers

LEA 02.2 Indicate whether your organisation plays a role in the engagement process that your service provider conducts.

☒ Yes

LEA 02.3

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

- ☒ We discuss the topic of the engagement (or ESG issue(s)) of engagement
- ☐ We discuss the rationale for the engagement
- ☒ We discuss the objectives of the engagement
- ☒ We select the companies to be engaged with
- ☒ We discuss the frequency/intensity of interactions with companies
- ☒ We discuss the next steps for engagement activity
- ☒ We participate directly in certain engagements with our service provider
- ☐ Other; specify
- ☐ We play no role in engagements that our service provider conducts.

☐ No

LEA 02.4

Additional information. [Optional]

We take the help of an external consultant who on our assignment identifies the companies and sets goals for the dialogues. The consultant is also responsible for booking meetings with the companies and regularly reporting back to Öhman. Responsible for the dialogues at Öhman is the head of responsible investments. The dialogues are conducted together with the fund managers. The projects run for three years. Every year, the committee reviews the dialogues and focus areas for responsible investments. When we reach our goals, the committee can decide to close the dialogue and / or the focus area.

LEA 03

Mandatory

Public

Core Assessed

PRI 2

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagements.

☒ Yes

LEA 03.2

Indicate the criteria used to identify and prioritise engagements for each type of engagement.

Type of engagement	Criteria used to identify/prioritise engagements
Individual / Internal staff engagements	<div>Individual / Internal staff engagements</div> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements
Collaborative engagements	<div>Collaborative engagements</div> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <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 the ESG factors addressed by the collaboration <input type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers
Service-provider engagements	<div>Service-provider engagements</div> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred

	<input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our service providers
--	--

☐ No

LEA 04	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
----------	--

Individual / Internal staff engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input type="radio"/> All engagement activities <input checked="" type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out through collaboration
Service-provider engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by our service providers

LEA 05	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.
----------	---

Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input type="radio"/> Yes, in all cases <input checked="" type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.
Service-provider engagements	<input checked="" type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our service providers.

LEA 05.2

Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.

Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Service-provider engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 06

Mandatory

Public

Additional Assessed

PRI 2,4

LEA 06.1

Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

☒ Yes

LEA 06.2

Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- ☒ Collaborating with other investors
- ☒ Issuing a public statement
- ☒ Filing/submitting a shareholder resolution
- ☐ Voting against the re-election of the relevant directors
- ☐ Voting against the board of directors or the annual financial report
- ☐ Submitting nominations for election to the board
- ☐ Seeking legal remedy / litigation
- ☒ Reducing exposure (size of holdings)
- ☒ Divestment
- ☐ Other; specify

☐ No

LEA 07

Voluntary

Public

Additional Assessed

PRI 1,2

LEA 07.1

Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No
Service-provider engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.2	Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.
-----------------	--

- ☒ Involving investment decision-makers when developing an engagement programme
- ☒ Holding investment team meetings and/or presentations
- ☒ Using IT platforms/systems that enable data sharing
- ☐ Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- ☐ Other; specify
- ☐ None

LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.
-----------------	---

Type of engagement	Insights shared
Individual/Internal staff engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No
Service-provider engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.4	Additional information. [Optional]
-----------------	------------------------------------

Öhman publish an annual report about our active ownership

LEA 08	Mandatory	Public	Gateway	PRI 2
---------------	------------------	---------------	----------------	--------------

LEA 08.1	Indicate whether you track the number of your engagement activities.
-----------------	--

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track
Collaborative engagements	<input checked="" type="radio"/> Yes, we track the number of collaborative engagements in full <input type="radio"/> Yes, we partially track the number of our collaborative engagements <input type="radio"/> We do not track
Service-provider engagements	<input checked="" type="radio"/> Yes, we track the number of service-provider engagements in full <input type="radio"/> Yes, we partially track the number of our service-provider engagements <input type="radio"/> We do not track

LEA 08.2 Additional information. [Optional]

We log all our engagement dialogues in an internal database. In the database we formalise the objective with each dialogue and we decide KPIs. The database is shared with the fund managers. The esg-team is responsible for recording and monitoring the dialogues and update the database.

Outputs and outcomes

LEA 09	Mandatory to Report Voluntary to Disclose	Public	Core Assessed	PRI 2
--------	---	--------	---------------	-------

LEA 09.1 Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.

	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/>	26	1
Collaborative engagements	<input type="checkbox"/>	305	13
Service-provider engagements	<input type="checkbox"/>	25	1

LEA 09.2

Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).

No. of interactions with a company	% of engagements
One interaction	<input type="radio"/> >76% <input checked="" type="radio"/> 51-75% <input type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
2 to 3 interactions	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
More than 3 interactions	<input type="radio"/> >76% <input type="radio"/> 51-75% <input type="radio"/> 11-50% <input checked="" type="radio"/> 1-10% <input type="radio"/> None
Total	100%

LEA 09.3

Indicate the percentage of your collaborative engagements in which you were the 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 09.4

Indicate the percentage of your service-provider engagements in which you had some involvement during the reporting year.

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

LEA 10	Voluntary	Public	Additional Assessed	PRI 2
--------	-----------	--------	---------------------	-------

LEA 10.1	Indicate which of the following your engagement involved.
----------	---

- ☒ Letters and emails to companies
 - ☐ In a minority of cases
 - ☒ In a majority of cases
 - ☐ In all cases
- ☒ Meetings and/or calls with board/senior management
 - ☒ In a minority of cases
 - ☐ In a majority of cases
 - ☐ In all cases
- ☒ Meetings and/or calls with the CSR, IR or other management
 - ☐ In a minority of cases
 - ☒ In a majority of cases
 - ☐ In all cases
- ☒ Visits to operations
 - ☒ In a minority of cases
 - ☐ In a majority of cases
 - ☐ In all cases
- ☒ Visits to supplier(s) in supplier(s) from the company's supply chain
 - ☒ In a minority of cases
 - ☐ In a majority of cases
 - ☐ In all cases
- ☒ Participation in roadshows
 - ☒ In a minority of cases
 - ☐ In a majority of cases
 - ☐ In all cases
- ☐ Other

LEA 10.2	Additional information. [Optional]
----------	------------------------------------

A normal engagement process starts with a letter to the company (IR) addressing the issue and asking for a meeting. If the dialogue is constructive and fruitful we keep talking to IR or the person most relevant to talk to within the company. If a company is reluctant to talk to us we address the CEO or Chair person. We also seek to work together with other investors when a case is challenging.

Engagement cases are discussed within the esg-team on a weekly basis. On a need-to-do basis we discuss the the most relevant fund managers.

LEA 11	Voluntary	Public	Descriptive	PRI 2
--------	-----------	--------	-------------	-------

LEA 11.1	Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.
----------	--

☒ Add Example 1

ESG Topic	<p>General ESG, Sustainability reporting</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input checked="" type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input checked="" type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>A swedish micro cap company. Our aim was to convince the company to launch a project with the ambition to develop a sustainability strategy.</p>
Scope and Process	<p>During the year we initiated a dialogue with the biotech company. The company is in a development phase and we have discussed at meetings how the company can establish and develop a sustainability strategy. During the year, the company decided to conduct a stakeholder dialogue and materiality analysis something that Öhman encouraged, which we believe is positive for their continued work.</p>
Outcomes	<p><input type="checkbox"/> Company changed practice</p> <p><input type="checkbox"/> Company committed to change</p> <p><input checked="" type="checkbox"/> Disclosure / report published</p> <p><input type="checkbox"/> Divestment</p> <p><input type="checkbox"/> Failed/no outcome</p> <p><input type="checkbox"/> Increased understanding / information</p> <p><input type="checkbox"/> Invested in company</p> <p><input type="checkbox"/> Ongoing</p>

	<input type="checkbox"/> Voting <input type="checkbox"/> Other
--	---

☒ Add Example 2

ESG Topic	<p>Climate Change, Company leadership issues, Pollution, Sustainability reporting, Labour practices and supply chain management, Other</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input checked="" type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input checked="" type="checkbox"/> Company leadership issues</p> <p><input checked="" type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input checked="" type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input checked="" type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input checked="" type="checkbox"/> Other</p>
Conducted by	<p><input type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p> <p><input checked="" type="checkbox"/> Service provider</p>
Objectives	<p>Öhman engages in a dialogue with a number of major players in the fishing industry to improve their work on responsible fishing</p> <p>The project aims in particular to strengthen the companies' efforts to manage environmental risks related to fisheries and aquaculture, such as overfishing, biodiversity, energy consumption and the presence of chemicals and antibiotics, and increase transparency around this.</p>
Scope and Process	<p>Since the beginning of 2018, several meetings have been held with the six companies. They have shown a general openness and willingness to enter into a dialogue with us investors. In 2019, all companies have improved one or two steps. All companies now meet the CPI for sustainable fisheries policy. This also means that compared to the base report from June 2018, all companies have now shown improvements. The three best-performing companies all have a solid commitment to sustainable fishing, which is manifested either in a formal policy or code of conduct, together with a thorough process for risk assessment and risk management. The criterion where all companies are weak is about the supply chain. Failure to control the risks of subcontractors poses a serious risk to a company. Our experience shows that companies have more in place than what is published publicly. Openness is the key because it is the way they can show that they are taking responsibility. Since we started the dialogues, half of the companies have reported an increased number of certified production facilities according to ASC (Aquaculture Stewardship Council).</p>
Outcomes	<p><input checked="" type="checkbox"/> Company changed practice</p>

	<input type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
--	--

☒ Add Example 3

ESG Topic	<p>Climate Change, Sustainability reporting, Other</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input checked="" type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input checked="" type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input checked="" type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>Climate change is one of the biggest risks we as long-term investors face. Although many companies have officially endorsed the Paris Agreement and published climate commitments, they also fund industry organizations that actively oppose political solutions that are crucial to a fair transition to a future climate-smart economy. We want companies to ensure that they do not support these organizations. We want to see greater transparency from our portfolio companies. We want to know if they are members of organizations working towards important political changes. The objective is to get the companies : • identify all climate policy commitments undertaken by the company, directly or indirectly • assess whether the commitments are adapted to the company's position for climate change • assess whether the commitments support cost-effective climate measures to mitigate</p>
Scope and Process	<p>In 2019, we have focused our dialogues on four Swedish companies, all of which are members of the National Association of Manufactures (NAM). NAM is one of America's largest corporate networks and lobbying organizations with over 14,000 companies as members. Among other things, NAM supported the US withdrawal from the Paris Agreement. They are working to repeal climate legislation that has already been introduced, including the US Clean Power Plan. Of the four companies, only one publicly reports membership in NAM. None of the companies report how to act in cases where an organization you are a member of acts in a way that is not in line with the company's attitude. The dialogues do not develop in the way we wish.</p>

Outcomes	<input type="checkbox"/> Company changed practice <input type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input checked="" type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
----------	--

☒ Add Example 4

ESG Topic	<p>Human rights, Sustainability reporting, Labour practices and supply chain management</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input checked="" type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input checked="" type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input checked="" type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>The target company is a global leader in e-commerce. The aim is to get the company to adopt and publicly disclose a comprehensive policy to respect human rights, including ensuring safe and healthy workplaces; prohibiting discrimination and retaliation; affirming the right of workers to form and join trade unions and bargain collectively; and describing the process the Company will use to identify, assess, prevent, mitigate, and, where appropriate, address adverse human rights impacts.</p>
Scope and Process	<p>The dialogue was initiated late 2018. During 2019 we have had several meetings with the company. Both individually and also collaboratively. During the summer we launched a collaborative initiative in PRI to collect signatures to a letter. In the letter we asked for a meeting to top-management to discuss human rights. By the end of the year we filed a resolution.</p>
Outcomes	<p><input type="checkbox"/> Company changed practice</p> <p><input type="checkbox"/> Company committed to change</p> <p><input checked="" type="checkbox"/> Disclosure / report published</p> <p><input type="checkbox"/> Divestment</p> <p><input type="checkbox"/> Failed/no outcome</p> <p><input type="checkbox"/> Increased understanding / information</p>

	<input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
--	---

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

(Proxy) voting and shareholder resolutions

LEA 12	Mandatory	Public	Descriptive	PRI 2
--------	-----------	--------	-------------	-------

LEA 12.1 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 policies
- ☐ Other (explain)
- ☐ We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.
- ☐ We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- ☐ We hire service providers who make voting decisions on our behalf.

LEA 12.2 Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.

Öhman Fonder's CEO is responsible for corporate governance issues. The CEO, or the CEO appoints, shall once a year report to the Board of Directors statements made by the fund company at individual AGMs. Monitoring of general meetings takes place with internal system support. When the agenda is published, the analyst is informed who evaluates the proposals on the agenda and decides whether voting is required. Voting can take place through a proxy, a custodian bank or through a personal attendance at the general meeting. Which approach is chosen is determined on a case-by-case basis. In cases where the fund company has a different opinion and decides to vote against a proposal, it must be communicated to the company prior to the general meeting.

LEA 14	Voluntary	Public	Additional Assessed	PRI 2
--------	-----------	--------	---------------------	-------

LEA 14.1	Does your organisation have a securities lending programme?
-----------------	---

☒ Yes

LEA 14.3	Indicate how the issue of voting is addressed in your securities lending programme.
-----------------	---

- ☒ We recall all securities for voting on all ballot items
- ☐ We maintain some holdings, so that we can vote at any time
- ☐ We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)
- ☐ We recall some securities so that we can vote on their ballot items on an ad-hoc basis
- ☐ We empower our securities-lending agent to decide when to recall securities for voting purposes
- ☐ We do not recall our securities for voting purposes
- ☐ Other (specify)

☐ No

LEA 15	Mandatory	Public	Descriptive	PRI 2
---------------	------------------	---------------	--------------------	--------------

LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.
-----------------	--

- ☐ 100%
- ☐ 99-75%
- ☐ 74-50%
- ☐ 49-25%
- ☐ 24-1%
- ☒ Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 16	Mandatory	Public	Core Assessed	PRI 2
---------------	------------------	---------------	----------------------	--------------

LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.
-----------------	---

- ☐ 100%
- ☐ 99-75%
- ☐ 74-50%
- ☐ 49-25%
- ☐ 24-1%
- ☐ We do not communicate the rationale to companies
- ☒ Not applicable because we and/or our service providers did not abstain or vote against management recommendations

LEA 17	Mandatory	Public	Core Assessed	PRI 2
---------------	------------------	---------------	----------------------	--------------

LEA 17.1

For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- ☒ We do track or collect this information

Votes cast (to the nearest 1%)

%

0

Specify the basis on which this percentage is calculated

- ☐ Of the total number of ballot items on which you could have issued instructions
- ☒ Of the total number of company meetings at which you could have voted
- ☐ Of the total value of your listed equity holdings on which you could have voted
- ☐ We do not track or collect this information

LEA 17.2

Explain your reason(s) for not voting on certain holdings

- ☐ Shares were blocked
- ☐ Notice, ballots or materials not received on time
- ☐ Missed deadline
- ☐ Geographical restrictions (non-home market)
- ☐ Cost
- ☐ Conflicts of interest
- ☒ Holdings deemed too small
- ☐ Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- ☐ Client request
- ☒ Other (explain)

We have criteria for when to vote and no company met these criteria. In companies where Öhman on the record day for the general meeting owns > 2% of the votes, and that we have identified reasons to vote.

LEA 18

Voluntary

Public

Additional Assessed

PRI 2

LEA 18.1

Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.

- ☐ Yes, we track this information
- ☒ No, we do not track this information

LEA 19

Mandatory

Public

Core Assessed

PRI 2

LEA 19.1

Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

☒ Yes

☐ No

LEA 19.2

Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.

- ☒ Contacting the company's board
- ☐ Contacting the company's senior management
- ☐ Issuing a public statement explaining the rationale
- ☐ Initiating individual/collaborative engagement
- ☐ Directing service providers to engage
- ☐ Reducing exposure (holdings) / divestment
- ☐ Other

LEA 20

Voluntary

Public

Descriptive

PRI 2

LEA 20.1

Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.

☐ Yes

☒ No

Ohman

Reported Information

Public version

Direct - Fixed Income













PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.













ESG incorporation in actively managed fixed income

Implementation processes

FI 01	Mandatory	Public	Gateway	PRI 1
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.			

SSA	 Screening alone
	100
	 Thematic alone
	0
	 Integration alone
	0
	 Screening + integration strategies
	0
Corporate (financial)	 Thematic + integration strategies
	0
	 Screening + thematic strategies
	0
	 All three strategies combined
	0
	 No incorporation strategies applied
	0
	100%
Corporate (financial)	 Screening alone
	0
	 Thematic alone
	0
Corporate (financial)	 Integration alone
	0
Corporate (financial)	 Screening + integration strategies
	100

	<div> <div></div> <div>Thematic + integration strategies</div> </div> <div>0</div>
	<div> <div></div> <div>Screening + thematic strategies</div> </div> <div>0</div>
	<div> <div></div> <div>All three strategies combined</div> </div> <div>0</div>
	<div> <div></div> <div>No incorporation strategies applied</div> </div> <div>0</div>
	100%

Corporate (non-financial)	 Screening alone	0
	 Thematic alone	0
	 Integration alone	0
	 Screening + integration strategies	90
	 Thematic + integration strategies	10
	 Screening + thematic strategies	0
	 All three strategies combined	0
	 No incorporation strategies applied	0
		100%
Securitised	 Screening alone	100
	 Thematic alone	0
	 Integration alone	0
	 Screening + integration strategies	0

	<div>Thematic + integration strategies</div> <div>0</div>
	<div>Screening + thematic strategies</div> <div>0</div>
	<div>All three strategies combined</div> <div>0</div>
	<div>No incorporation strategies applied</div> <div>0</div>
	100%

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
---------	---

It is our belief that ESG considerations is essential in order to be able to assess the risks which could impact an issuers creditworthiness. Hence, we have decided to take a systematic approach to ESG incorporation within fixed income through a combination of the strategies below.

Screening is applied (quarterly) to all our fixed income investments. This strategy was chosen to meet client demands, but also because we believe that certain business practices simply are misaligned with a sustainable development and therefore not eligible for investment.

Thematic strategy is applied primarily to our Green Bond fund, but all our corporate bond funds can and do invest in both green bonds and sustainability bonds. In addition to second opinion and third-party reviews, we also conduct our own assessment of the issuer's green bond framework in order to make sure that the use of proceeds meet our sustainability criterias.

Integration strategy. All fixed income mandates are managed in-house, in close collaboration between our fixed income team and ESG-team. We have taken a systematic approach to ESG integration which is explained in more detail in section FI 10-12.

FI 01.3	Additional information [Optional].
---------	------------------------------------

In terms of SSA, we only invest in Swedish sovereign bonds and Swedish municipalities, which we assess as having good governance and low ESG-risk.

FI 02	Mandatory to Report Voluntary to Disclose	Public	Core Assessed	PRI 1
-------	---	--------	---------------	-------

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

Select all that apply

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

Indicate who provides this information

- ☒ ESG research provider
☐ Sell-side
☒ In-house – specialised ESG analyst or team
☐ In-house – FI analyst, PM or risk team
☐ Other, specify

- ☒ ESG factor specific analysis

Indicate who provides this information

- ☐ ESG research provider
☒ Sell-side
☒ In-house – specialised ESG analyst or team
☐ In-house – FI analyst, PM or risk team
☐ Other, specify

- ☒ Issuer-level ESG analysis

Indicate who provides this information

- ☒ 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

Indicate who provides this information

- ☐ 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.

We use two main data providers for ESG data and research on. In addition to this, we also conduct our own issuer-specific assessment in-house - which is more qualitative in nature - to complement the quantitative rating from the ESG data provider.

We have developed sector specific ESG scorecards including the most material aspects that could affect certain issuers or industries. These scorecards have been developed by the ESG-team in collaboration with the portfolio managers, outlining how relevant each ESG variable is, its potential risk and its importance for the credit valuation. The inhouse-scorecards use ESG data from third parties as input, based on which we then build our own materiality framework and assessment. We use ESG data from different providers in order to be able to benchmark different metrics and make sure the information is reliable and robust.

Our current ESG data and research providers are Refinitiv (raw ESG company data), Sustainalytics (raw ESG company data and issuer-specific analysis) as well as sell-side research, for example from the credit rating agencies. We also use public information and industry benchmarks/rankings as input.

FI 03

Mandatory

Public

Additional Assessed

PRI 1

FI 03.1

Indicate how you ensure that your ESG research process is robust:

- ☒ Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services
- ☒ 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 and regular reviews of ESG research are undertaken in a systematic way.
- ☒ A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country.
- ☐ 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 displayed on front office research platforms
- ☒ ESG information is a standard item on all individual issuer summaries, research notes, 'tear sheets', 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 03.3

Additional information. [Optional]

We have an ESG research log where ESG analysts add company-specific research notes, for example after company presentations and meetings. For more information on the materiality framework and ESG scorecards which we use and regularly update, see FI 10.

The portfolio managers always have access to this log. The ESG-team send ESG-updates to relevant portfolio team when a change is made for example when a company issues a new bond. These ESG-updates includes a short comment, the company's ESG risk profile and the ESG-teams' view/outlook on this particular issuer. Through these updates the ESG-team also notify portfolio managers about the engagement process and potential changes in our assessment.

If an issuer has high ESG risk rating, and if the ESG team has a negative outlook for the specific issuer, this is discussed at regular meetings with the portfolio team and the ESG team (monthly). Depending on the outcome, we could decide to engage or divest.

(A) Implementation: Screening**FI 04****Mandatory****Public****Gateway****PRI 1****FI 04.1**

Indicate the type of screening you conduct.

Select all that apply

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

Screening is conducted quarterly and is provided by a third-party ESG data provider, results are reviewed by the ESG team.

Negative/exclusionary screening:

Norms-based screening. Issuers confirmed for violating international norms and conventions (ILO, UN Global Compact etc., see FI 05.1 for more examples) are not eligible for investments.

Controversial weapons. Screens out issuers involved in manufacture and production of cluster munitions, biological and chemical weapons and anti-personnel landmines.

Product-related. Screens out issuers involved in production and distribution of alcohol, tobacco, pornography and gambling. Also screens out companies involved in extraction of fossil fuels (max. 0% of company revenues allowed), as well as coal-based energy production or oil- and gas services (max. 10% of company revenues allowed).

Positive screening:

Bond issuers ESG ratings is retrieved from ESG data provider, quarterly updated and readily available in centralized portfolio data system. Underlying ESG data variables feeds into sector-specific scorecard, used for issuer assessment and selection. Screening results and specific ESG issues are discussed at regular meetings with the portfolio management team (monthly).

☒ Example 1

	Type of fixed income
<input checked="" type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG factors
<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance	
	Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input type="checkbox"/> Positive/ best-in-class <input type="checkbox"/> Norms-based	
	Description of how ESG factors are used as the screening criteria
<p>Negative/exclusionary screening: Controversial weapons. Screens out companies involved in manufacture and production of cluster munitions, biological and chemical weapons and anti-personnel landmines. Product-related (ethical/social factors). Screens out companies involved in production and distribution of alcohol, tobacco, pornography and gambling. Sector-specific (environmental factors). Also screens out companies involved in extraction of fossil fuels (max. 0% of company revenues allowed), as well as coal-based energy production or oil- and gas services (max. 10% of company revenues allowed).</p>	

☒ Example 2

	Type of fixed income
<input checked="" type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG factors
<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance	
	Screening
<input type="checkbox"/> Negative/ exclusionary <input type="checkbox"/> Positive/ best-in-class <input checked="" type="checkbox"/> Norms-based	
	Description of how ESG factors are used as the screening criteria
<p>Norms-based screening. Companies confirmed for violating international norms and conventions are not eligible for investments, based on UN Global Compact, OECD guidelines and ILO conventions.</p> <p>Examples of environment-related conventions, human rights, labour and anti-corruption:</p> <ul style="list-style-type: none"> • Rio Declaration on Environment and Development • The Declaration of the United Nations Conference on the Human Environment • Paris Agreement • The Universal Declaration of Human Rights • Convention on the Rights of the Child • Declaration on the Rights of Indigenous People • ILO Declaration on Fundamental Principles and Rights at Work • UN Convention against Corruption 	

☒ Example 3

	Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG factors
<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance	
	Screening
<input type="checkbox"/> Negative/ exclusionary <input checked="" type="checkbox"/> Positive/ best-in-class <input type="checkbox"/> Norms-based	
	Description of how ESG factors are used as the screening criteria
<p>Positive screening. Bond issuers ESG ratings is retrieved from ESG data provider, quarterly updated and readily available in centralized portfolio data system. ESG factors we have included in the corporate (financial) scorecard are: climate-related risks, ESG integration, business ethics and compliance, product quality and governance, management incentives and risk & resilience. Underlying ESG data variables feeds into sector-specific scorecard, used for issuer assessment and selection.</p>	

☒ Example 4

	Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG factors
<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance	
	Screening
<input type="checkbox"/> Negative/ exclusionary <input checked="" type="checkbox"/> Positive/ best-in-class <input type="checkbox"/> Norms-based	
	Description of how ESG factors are used as the screening criteria
<p>Positive screening. Bond issuers ESG ratings is retrieved from ESG data provider, quarterly updated and readily available in centralized portfolio data system. ESG factors we have included in the corporate (non-financial) scorecard are for example: environmental governance, climate change, resource use, human rights, employee relations, CSR strategy and business ethics. Underlying ESG data variables feeds into sector-specific scorecard, used for issuer assessment and selection.</p>	

☐ Example 5

FI 06	Mandatory	Public	Core Assessed	PRI 1
FI 06.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.			

Type of screening	Checks
Negative/exclusionary screening	<input checked="" type="checkbox"/> Analysis is 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 once a year. <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 yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Positive/best-in-class screening	<input checked="" type="checkbox"/> Analysis is 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 once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Norms-based screening	<input checked="" type="checkbox"/> Analysis is 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 once a year. <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 yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

FI 06.2

Additional information. [Optional]

The internal risk control function monitors on a daily basis that our fund holdings are in line with its screening criteria. Any deviations must immediately be reported to the portfolio manager, CEO and Head of Responsible investment. The portfolio managers must sell any position that are in breach of the screening criteria. Head of Responsible investment must annually report to the Board of Directors on the selection process and its compliance.

(B) Implementation: Thematic

FI 07	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1
-------	---	--------	-------------	-------

FI 07.1	Indicate what proportion of your thematic investments are (totalling up to 100%):
----------------	---

- ☒ Green/SDG bonds linked to environmental goals

	%
--	---

90

- ☐ Social/SDG bonds linked to social goals
- ☒ Sustainability/SDG bonds (combination of green and social linked to multiple SDG categories)

	%
--	---

10

- ☐ Other

FI 07.2	Describe your organisation's approach to thematic fixed income investing
----------------	--

Öhman offers one Green Bond Fund which applies a thematic strategy. Öhman Green Bond Fund invests in green bonds with a particular focus on investment grade corporate issuers. In addition to this, all of our corporate credit funds can invest in green bonds so it is not limited to one dedicated fund.

We actively seek to broaden the scope by investing more in sustainability bonds, with both a green and a social impact. For example, we have invested in one blue bond issued by the Nordic Investment Bank.

FI 07.3	Additional information [OPTIONAL]
----------------	-----------------------------------

We support the development of the green bond market. For example, we have engaged in the project Green Assets Wallet. The Green Assets Wallet (GAW) is the result of a consortium of leading capital market actors and technology innovators formed under the lead of Stockholm Green Digital Finance. The Wallet is a blockchain-tool that was developed to deliver efficiency and transparency to the green debt market in support of scaling the supply of, and investment in, credible green investment opportunities through validation and reporting of green impacts. Read more about the project here: <https://greenassetswallet.org/>

FI 08	Mandatory	Public	Core Assessed	PRI 1
-------	-----------	--------	---------------	-------

FI 08.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines..
----------------	--

- ☒ We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- ☒ We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- ☒ We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- ☒ We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- ☐ Other, specify
- ☐ None of the above

FI 08.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.
---------	--

If the issuer would not disburse bond proceeds as described in the green framework and other documents, we would engage with the issuer and potentially decide to divest.

FI 09	Mandatory	Public	Additional Assessed	PRI 1
-------	-----------	--------	---------------------	-------

FI 09.1	Indicate how you assess the environmental or social impact of your thematic investments.
---------	--

- ☒ We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- ☐ We ensure independent audits are conducted on the environmental or social impact of our investments
- ☐ We have a proprietary system to measure environmental and social impact
- ☐ We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- ☐ Other, specify
- ☐ None of the above

(C) Implementation: Integration

FI 10	Mandatory	Public	Descriptive	PRI 1
-------	-----------	--------	-------------	-------

FI 10.1	Describe your approach to integrating ESG into traditional financial analysis.
---------	--

It is our firm belief that ESG considerations is essential in order to be able to assess the risks and opportunities which could impact an issuers creditworthiness, both in the short- and long-term. For this reason, we have decided to take a systematic approach to ESG incorporation. During the last 1 ½ year we have been working on a more close collaboration between the fixed income team and ESG team. We have held dedicated workshops focusing on materiality at sector level, as well as discussed ESG in relation to the different characteristics which could influence our credit view (such as pricing, bond maturity and term structure). In particular, we have discussed how different time horizons for certain ESG risks could yield different investment decisions. This work has improved the overall knowledge in the fixed income team and the ESG team. Below follows a more elaborate description of our investment process.

ESG is a standard element in the credit evaluation and investment process. If we do not consider that the ESG risks would fundamentally impact the issuers credit quality or default risk, or if we believe that the bond issuer has the financial strength to mitigate the risks, these risks are not considered in the investment decision. The main goal is to identify potential downside risks, for example to avoid costly scandals that could affect an issuer's ability to repay debt.

- PM's inform the ESG team of potentially interesting companies and new issuances. An **ESG Due Diligence** is conducted to ensure that it meets our minimum requirements, if it is a new issuer which have not been assessed before. The ESG team makes a qualitative assessment of the company's ESG profile and makes a recommendation (positive / neutral / negative outlook). The ESG score from the external service provider, which is a more of a quantitative score, is thus complemented by our own qualitative assessment.
- We regularly monitor the ESG risks of our bond holdings. The credit analysis is partly built on a four-dimensional assessment of business risk; industry analysis, competitive position, management and country risk. The ESG factors can influence all of these dimensions of the business risk. The PM can decide to notch the business risk up or down, depending on how ESG factors weigh on and impact the credit credentials. These adjustments to the business risk are documented in our internal systems.
- We have developed sector specific ESG scorecards including the most material aspects that could affect specific industries. These scorecards have been developed by the ESG-team in collaboration with the

portfolio managers, outlining the ESG factors based on their potential risk and importance for the credit valuation. It is the PM's ultimate responsibility to assess how these factors impacts the pricing of the bond, such as how these risks and / or opportunities may affect the company's cash flow and creditworthiness.

- If an issuer has high ESG risk rating, and if the ESG team has a negative outlook for the specific issuer, this is discussed at regular meetings with the portfolio team and the ESG team (monthly). If we continue to have a negative view of the company's ESG profile, and do not see the necessary improvements, we can choose to divest. These regular meetings can also be dedicated to a specific sector to discuss which ESG factors we currently deem relevant to the credit assessment. We discuss individual corporates and sectors on a regular basis also to identify any material changes to their ESG profile.
- We could decide to invest in a company with a high ESG risk, if we consider that the company has the potential to improve or if we believe that we are compensated for the risk. ESG factors are thus evaluated alongside the financial credit metrics.

The strength of our integration process is that we have a close and ongoing dialogue between the ESG team, credit analysts and portfolio managers. Together we form a view and determine the impact of ESG related issues in our bond selection process.

FI 10.2

Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.

Corporate (financial)

See FI 10.1 above. We use sector specific scorecards to identify the most material ESG issues, i.e. issues that are credit relevant.

Examples of material issues which we have a particular focus on in the **financial sector-scorecard**: climate-related risks, ESG integration, business ethics and compliance, product quality and governance, management incentives and risk & resilience. We believe that these metrics gives a general indication of how corporate financial issuers are positioned.

The scorecard is used by the PM's both once a year when the credit assessment of each issuer is updated, but also when evaluating a new bond issuer. Sometimes when we lack ESG data, the scorecard is used as a basis for dialogue with the issuer.

The ESG team also makes a qualitative assessment of the company's ESG profile and makes a recommendation (positive / neutral / negative outlook). The ESG data from the external service provider, which is a more of a quantitative score, is thus complemented by our own qualitative assessment.

These metrics are subject to change and are regularly reviewed. But in general we our assessment of corporate (financial) is tilted more towards governance issues.

Corporate (non-financial)

See above. As described for the financial bond issuers, we use **sector specific scorecards** to identify the most material ESG issues, i.e. issues that are credit relevant.

For example, we have developed scorecards for sectors to which we have a greater exposure in our portfolios such as real estate, transportation and energy & utilities.

The scorecard is used by the PM's both once a year when the credit assessment of each issuer is updated, but also when evaluating a new bond issuer. Sometimes when we lack ESG data, the scorecard is used as a basis for dialogue with the issuer.

The ESG team also makes a qualitative assessment of the company's ESG profile and makes a recommendation (positive / neutral / negative outlook). The ESG data from the external service provider, which is a more of a quantitative score, is thus complemented by our own qualitative assessment.

FI 11	Mandatory	Public	Core Assessed	PRI 1
-------	-----------	--------	---------------	-------

FI 11.1	Indicate how ESG information is typically used as part of your investment process.
---------	--

Select all that apply

	Corporate (financial)	Corporate (non-financial)	
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ESG analysis is used to adjust the internal credit assessments of issuers.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ESG analysis is used to adjust forecasted financials and future cash flow estimates.	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis impacts the ranking of an issuer relative to a chosen peer group.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
An issuer's ESG bond spreads and its relative value versus its sector peers are analysed to find out if all risks are priced in.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
The impact of ESG analysis on bonds of an issuer with different durations/maturities are analysed.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Sensitivity analysis and scenario analysis are applied to valuation models to compare the difference between base-case and ESG-integrated security valuation.	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis is integrated into portfolio weighting decisions.	<input type="checkbox"/>	<input type="checkbox"/>	
Companies, sectors, countries and currency and monitored for changes in ESG exposure and for breaches of risk limits.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
The ESG profile of portfolios is examined for securities with high ESG risks and assessed relative to the ESG profile of a benchmark.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other, specify in Additional Information	<input type="checkbox"/>	<input type="checkbox"/>	

FI 11.2	Additional information [OPTIONAL]
---------	-----------------------------------

We have developed sector specific ESG scorecards including the most material aspects that could affect specific industries. These scorecards have been developed by the ESG-team in collaboration with the portfolio managers, outlining the ESG factors based on their potential risk and importance for the credit valuation. The scorecard is used by the PM's both once a year when the credit assessment of each issuer is updated/adjusted. But it is also used by the PM when evaluating a new bond or issuer, alongside other credit-relevant metrics such as the issuer's bond spreads and term structure.

The ESG team use an ESG risk monitoring system to monitor for ESG risks in the portfolio. Changes to the ESG risk exposure and high-risk companies are regularly discussed

FI 12	Mandatory	Public	Additional Assessed	PRI 1
-------	-----------	--------	---------------------	-------

FI 12.1	Indicate the extent to which ESG issues are reviewed in your integration process.
---------	---

	Environment	Social	Governance
Corporate (financial)	<div>Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div>Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div>Governance</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (non-financial)	<div>Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div>Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div>Governance</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

FI 12.2	Please provide more detail on how you review E, S and/or G factors in your integration process.
---------	---

	Corporate (financial)
--	-----------------------

E, S and G factors and their underlying indicators are derived from different data providers, and feed into the ESG scorecard used by PM's.

As a part of our fundamental ESG due diligence and analysis, we always cover the following standard ESG factors; environmental governance, climate change, resource use, human rights, employee relations, CSR strategy and business ethics.

Material issues covered in ESG scorecard (specific for corporate financial issuers) are climate-related risks, ESG integration, business ethics and compliance, product quality and governance, management incentives and risk culture & resilience. In terms of financial bond issuers, the ESG factor relevance is more skewed towards social and governance issues.

	Corporate (non-financial)
--	---------------------------

E, S and G factors and their underlying indicators are derived from different data providers, and feed into the ESG scorecard used by PM's.

As a part of our fundamental ESG due diligence and analysis, we always cover the following standard ESG factors; environmental governance, climate change, resource use, human rights, employee relations, CSR strategy and business ethics.

The materiality of different ESG factors depend on the particular issuer and industry.

Fixed income - Engagement				
FI 14	Mandatory to Report Voluntary to Disclose	Public	Core Assessed	PRI 2
FI 14.1	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.			

Category	Proportion of assets
Corporate (financial)	<p> <input type="radio"/> >50% <input type="radio"/> 26-50% <input checked="" type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5% </p> <div> FI 14.2 Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets) </div> <p> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue </p>
Corporate (non-financial)	<p> <input type="radio"/> >50% <input type="radio"/> 26-50% <input checked="" type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5% </p> <div> FI 14.2 Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets) </div> <p> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue </p>
Securitised	<p> <input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="radio"/> More than 0%, less than 5% </p> <div> FI 14.2 Indicate your motivations for conducting engagement (Securitized fixed income assets). </div> <p> <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue </p>

FI 15	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1,2
-------	---	--------	---------------------	---------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

FI 15.1	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.)
----------------	---

Select all that apply

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

FI 15.2

Indicate how your organisation prioritises engagements with issuers.

Select all that apply

		Corporate (financial)	Corporate (non-financial)	Securitised
Size of holdings		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Credit quality of the issuer		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Duration of holdings		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Quality of transparency on ESG		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific markets and/or sectors		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific ESG themes		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Issuers in the lowest ranks of ESG benchmarks		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Issuers in the highest ranks of ESG benchmarks		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific issues considered priorities for the investor based on input from clients and beneficiaries		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.3

Indicate when your organisation conducts engagements with issuers.

Select all that apply

	Corporate (financial)	Corporate (non- financial)	Securitised
We engage pre-investment.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage post-investment.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage proactively in anticipation of specific ESG risks and/or opportunities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage in reaction to ESG issues that have already affected the issuer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage prior to ESG-related divestments.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.4

Indicate what your organisation conducts engagements with issuers on.

Select all that apply

	Corporate (financial)	Corporate (non- financial)	Securitised
We engage on ESG risks and opportunities affecting a specific bond issuer or its issuer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage on ESG risks and opportunities affecting the entire industry or region that the issuer belongs to.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage on specific ESG themes across issuers and industries (e.g., human rights).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.5

Indicate how your organisation ensures that information and insights collected through engagement can feed into the investment decision-making process.

Select all that apply

	Corporate (financial)	Corporate (non-financial)	Securitised
Ensuring regular cross-team meetings and presentations.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sharing engagement data across platforms that is accessible to ESG and investment teams.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging ESG and investment teams to join engagement meetings and roadshows.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Delegating some engagement dialogue to portfolio managers/credit analysts.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Involving portfolio managers when defining an engagement programme and developing engagement decisions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Establishing mechanisms to rebalance portfolio holdings based on levels of interaction and outcomes of engagements.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Considering active ownership as a mechanism to assess potential future investments.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not ensure that information and insights collected through engagement can feed into the investment decision-making process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.6
Additional information.[OPTIONAL]

As a financial stakeholder that provides and lend capital to companies we believe that we have a right to work with them and engage on ESG issues. We try to encourage companies to act sustainably so that they reduce their operating cash flow volatility over time and strengthen their credit profile. We believe that ESG investing is not only about investing in issuer's who already demonstrate good ESG profile, but also engaging with those who want to improve and are willing to work with lenders to achieve this.

The ESG team is primarily responsible for the engagement, but are working closely with the PM's to identify potential ESG issues and issuers. The results from the engagements with issuers are regularly discussed at monthly meetings with the PM's and shared via our front-desk data and research system.

Our own internal engagements are usually conducted pre-investment, when we identify a new issuer. Post-investment engagements usually are initiated if we identify a risk or issue, such as lack of transparency, or as a part of collaborative engagements.

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

FI 16.1	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 16.3	Additional information [OPTIONAL]
----------------	-----------------------------------

We do not have a publicly available document referring to fixed income engagement in particular, but we have internal guidelines.

Outputs and outcomes

FI 17	Mandatory to Report	Voluntary to Disclose	Public	Additional Assessed	General
--------------	----------------------------	------------------------------	---------------	----------------------------	----------------

FI 17.1	Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or performance.
----------------	---

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
We measure whether incorporating ESG impacts portfolio risk.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We measure whether incorporating ESG impacts portfolio returns.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We measure the ESG performance/profile of portfolios (relative to the benchmark).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 17.2	Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]
----------------	--

We measure the ESG profile of the portfolios in our Risk Monitor tool, which is then discussed at regular meetings.

FI 18	Voluntary	Public	Descriptive	PRI 1,2
--------------	------------------	---------------	--------------------	----------------

FI 18.1

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

Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised
ESG issue and explanation
<p>We came to the conclusion that certain consumer banks to be particularly exposed to high ESG risk. Partly due to the fact that household debt has been growing to a larger extent than the disposable income for the last couple of years, which is not sustainable in the long-term. But also due to the regulatory risks related to predatory lending, lack of robust product governance practices and aggressive marketing. We identified the issuers in our universe that were not as well prepared to manage these regulatory and reputational risks. This was the conclusion from a discussion between the ESG team and portfolio manager.</p>
RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Engagement <input type="checkbox"/> ESG incorporation in passively managed funds
Impact on investment decision or performance
<p>Based on the above identified ESG risk factors, we made an assessment of the different consumer banks in our universe and decided to divest certain issuers. We did decide to stay invested in those issuers we perceived as more well-managed and prepared to handle these risks, or with lower exposure to consumer loans in particular.</p> <p>Read more about this decision here (in Swedish): https://www.ohman.se/nyheter/2019/lunch-bank-2/</p>

☒ Example 2

	Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG issue and explanation
We have continued to increase our investment in green bonds.	
	RI strategy applied
<input type="checkbox"/> Screening <input checked="" type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Engagement <input type="checkbox"/> ESG incorporation in passively managed funds	
	Impact on investment decision or performance
Examples of green bond investments are Wallenstam and Heimstaden (identified as green and rising stars from a sustainability standpoint), Vacse (robust green bond framework and clear targets), Electrolux and Stora Enso (science-based targets, clear targets on emission reductions and the green bond framework connected to the overall sustainability strategy). In total we have approx. 3bn in green bond investments.	

☒ Example 3

	Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG issue and explanation
<p>One of the largest airport operators announced a green bond issuance. After having evaluated the green bond framework, we (ESG team + PM), came to the conclusion that the issuance would enable an investment in the expansion of the airports, hence also an increased flight capacity and net-negative climate impact.</p>	
	RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Engagement <input type="checkbox"/> ESG incorporation in passively managed funds	
	Impact on investment decision or performance
<p>We decided that we would not participate in the transaction, given that it was not suitable for green financing and also because the green bond framework could have been further connected to the the issuer's overarching sustainability targets.</p>	

☒ Example 4

	Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial) <input type="checkbox"/> Securitised	
	ESG issue and explanation
<p>We have had an engagement dialogue with a real estate company. The engagement was initiated over a year ago due to the fact that they did not have as pronounced sustainability focus as many of their peers in the real estate industry. However, we saw that there was potential for improvement.</p>	
	RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Engagement <input type="checkbox"/> ESG incorporation in passively managed funds	
	Impact on investment decision or performance
<p>In April 2019, the company adopted science-based targets, which is in line with what we have encouraged and something we consider positive.</p>	

☐ Example 5

Ohman

Reported Information

Public version

Confidence building measures

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Confidence building measures

CM1 01	Mandatory	Public	Additional Assessed	General
--------	-----------	--------	---------------------	---------

CM1 01.1 Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- ☐ Third party assurance over selected responses from this year's PRI Transparency Report
- ☐ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- ☐ Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- ☐ Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- ☒ Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
 - ☒ Whole PRI Transparency Report has been internally verified
 - ☐ Selected data has been internally verified
- ☐ Other, specify
- ☐ None of the above

CM1 02	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------

CM1 02.1 We undertook third party assurance on last year's PRI Transparency Report

- ☐ Whole PRI Transparency Report was assured last year
- ☐ Selected data was assured in last year's PRI Transparency Report
- ☒ We did not assure last year's PRI Transparency report
- ☐ None of the above, we were in our preparation year and did not report last year.

CM1 03	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------

CM1 03.1 We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- ☐ We adhere to an RI certification or labelling scheme
- ☐ 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
- ☐ ESG audit of holdings
- ☐ Other, specify
- ☒ None of the above

CM1 04	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------

CM1 04.1

Do you plan to conduct third party assurance of this year's PRI Transparency report?

- ☐ Whole PRI Transparency Report will be assured
- ☐ Selected data will be assured
- ☒ We do not plan to assure this year's PRI Transparency report

CM1 07**Mandatory****Public****Descriptive****General****CM1 07.1**

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

Who has conducted the verification

- ☒ CEO or other Chief-Level staff

Sign-off or review of responses

- ☒ Sign-off
- ☒ Review of responses
- ☐ The Board
- ☒ Investment Committee

Sign-off or review of responses

- ☐ Sign-off
- ☒ Review of responses
- ☒ Compliance Function
- ☒ RI/ESG Team
- ☒ Investment Teams
- ☐ Legal Department
- ☐ Other (specify)