Storebrand

Statement on principal adverse impacts of investment decisions on sustainability factors

Storebrand Asset Management AS

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Financial market participant: Storebrand Asset Management AS (529900ZTCGG5XNFGB694)

Summary

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

The following is the Principal Adverse Impact (PAI) Statement of Storebrand Asset Management AS (SAM). SAM owns subsidiaries which are also Financial market participants in their own capacity, and therefore, parts of the capital included in this statement, will also be disclosed in the statements for the subsidiaries. SKAGEN AS has been a part of the Storebrand Group since 2017 and has until November 2023 operated under exemptions as a separate management company and subsidiary of SAM. As a result, SKAGEN AS was dissolved through a parent-subsidiary merger of SKAGEN AS and SAM, and after the merger SAM became manager of SKAGEN mutual funds. Under the new structure, SKAGENs business consist of managing SKAGEN mutual funds under an outsourcing agreement with SAM. Data for SKAGEN funds are therefore included in SAMs PAI statement. Data for Storebrand Fonder AB is not included in this statement as they publish their own statements, please see their respective webpage for their PAI statement.

This statement is a requirement of the EU Sustainable Finance Disclosure Regulation. When SAM assesses the principal adverse impacts on sustainability factors (PAI), SAM evaluates the assets managed on an entity level, with the exception of assets where data on PAIs are not available.

SAM continuously assesses any potential adverse environmental, social or governance impact from activities in investee companies. For companies with heightened risk of potential adverse impact, our Risk & Active Ownership team will make an in-depth analysis of the issue and decide on any further action, such as engagement or recommendation for exclusion. More information on our engagement process is found in our Sustainable Investments Policy. Further integration and considerations of PAIs may take place at SAM's subsidiaries and specific funds or investment vehicles.

This version of this document applies as of June 30th, 2024. The statement will be revised and updated as needed.

Description of the principal adverse impacts on sustainability factors

All economic activity has some form of impact, and SAM will gather data and monitor the principal adverse impact of all mandatory as well as several additional indicators. We will use this screening to further identify and manage sustainability risks from our investments. SAM has been working to reduce adverse impact in its portfolios since the turn of the century and it has identified the following as main adverse sustainability impact categories that applies to all equity and debt portfolios:

- Adverse impacts affecting the environment and climate such as: severe environmental damage; greenhouse gas emissions; biodiversity loss and deforestation.
- Adverse impact affecting workers, communities, and society such as: violations of basic workers' rights; forced labor; gender/diversity discrimination or indigenous rights violations
- Adverse impact in connection with gross corruption and money laundering
- Adverse impact in connection with controversial weapons (landmines, cluster munitions and nuclear weapons)
- Adverse impact in connection with tobacco products

SAM already uses environmental, social and governance data in a sustainability rating and for other screening and engagement purposes, but it will now also be used specifically for the screening of principal adverse sustainability impacts.

We have also identified some products as adverse impacts that we aim to avoid in all our funds such as coal or oil sands and others for some of our portfolios such as alcohol, gambling, and conventional weapons. These products are associated with significant risks and liabilities from a societal, environmental or health related harm. See our Sustainable Investment Policy at www.storebrand.com for more detail.

The table below describes the current work and planned actions we are taking to address each indicator.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Green-house gas emissions	**1. GHG emissions expressed in tonnes**	Scope 1 GHG emissions in tonnes	1 200 148 tonnes CO2e (coverage 63%)	1 268 288 tonnes CO2e (coverage 72%)	The increase in scope 1 is mainly due to the merger of SKAGEN AS into SAM in 2023, resulting in a greater AUM and thus greater GHG emissions. We also see an increase in data coverage resulting in more accurate data. Primary data sources are Sustain-alytics, Trucost, and Stamdata.	**Actions taken:** Storebrand Asset Management has committed to our investment portfolios having net-zero GHG emissions by 2050, at the latest. Our long-term ambition is backed up by short-term strategies, and we have set a target to reduce the emissions intensity of our investments in listed equity, publicly traded corporate debt and real estate) by 32% from baseline year 2018 to 2025. (Including scope 1 and 2 emissions of investee companies, in accordance with NZAOA (Net Zero Asset Owner Alliance) methodology). While our emissions reduction target is intensity-based, we also disclose absolute owned emissions as well as carbon footprint. Our Climate Strategy - Storebrand Progress report on nature and climate (September 2023) We have designed an engagement approach to create an impact in the real economy and encourage companies to define and implement climate strategies align with the goals of the Paris Agreement and reaching net-zero emissions by 2050 or sooner. Emphasis will be placed on the emitters that generate the biggest amounts of owned emissions in our portfolios, on and companies that have significant impact on ecosystems with high carbon value. These dialogues have been carried out at the C-suite level and through our participation in the Climate Action 100+ and the Institutional Investors Group on Climate Change (IIGCC). As part of our engagement strategy, we have also identified companies that are not ready for a transition to a low-carbon economy. Building on the data from Transition Pathway Initiative, Climate Action 100+ and self-collected data, climate laggards have been identified and direct concerns raised to the companies. Where laggards are held actively, this is flagged to investment analysts who have the opportunity to engage with companies on their climate change approach prior to voting. If we do not see any significant improvements, we will vote against the financial statements of these companies at the Annual General Meetings.
		Scope 2 GHG emissions in tonnes	283 846 tonnes CO2e (coverage 63%)	401 126.9 tonnes CO2e (coverage 72%)	The increase in scope 2 is mainly due to the merger of SKAGEN AS into SAM in 2023, resulting in a greater AUM and thus greater GHG emissions. Primary data sources are Sustainalytics, Trucost, and Stamdata.	
		Scope 3 GHG emissions in tonnes	9 554 500 tonnes CO2e (coverage 63%)	14 450 244 tonnes CO2e (coverage 71%)	The increase in scope 3 is both due to the merger of SKAGEN AS into SAM in 2023, resulting in a greater AUM and thus greater GHG emissions and due to increased emissions of a few investee companies. It is however worth noting that these investee companies have verified science-based targets in line with 1.5C, which covers their scope 3 emissions, and hence their target and ambition is to mitigate this impact. We also see an increase in data coverage resulting in more accurate data. Primary data sources are Sustainalytics, Trucost, and Stamdata.	

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
		Total GHG emissions in tonnes	11 038 451 tonnes CO2e (coverage 63%)	16 112 243 tonnes CO2e (coverage 67%)	The increase in total GHG emission is an effect of the merger of SKAGEN AS into SAM and also increased scope 3 emissions of a few investee companies. We also see an increase in data coverage resulting in more accurate data. Engagement data for PAI 1-3 includes all engagements related to GHG emissions and climate change. Primary data sources are Sustainalytics, Trucost, and Stamdata.	For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Climate change is one of our top 3 priority engagement themes for 2024-2026. For status updates on these engagements, please see our regular reporting in the quarterly and annual Sustainable Investment reports: Document library - www.storebrand.com **Targets for reference period:** Our climate target for 2025 is to reduce emissions intensity with 32% for specific asset classes (listed equity, publicly traded corporate debt and real estate). Status for end of year 2023 is 50% reduction for listed equity and fixed income, and 44% reduction in real estate (from 2018). Performance against our climate targets are reported to the Board at least twice a year.
	2. Carbon footprint	Carbon footprint	464.58 tonnes per million EUR invested (coverage 60%)	454.82 tonnes per million EUR invested (coverage 65%)	Primary data sources are Sustainalytics, Trucost, and Stamdata. Metric showing tonnes GHG emission per million EUR invested.	**Actions:** Storebrand AM measures the carbon emissions of the investment portfolio, which can then be used to compare portfolio emissions to global benchmarks, identify priority areas for reduction (including the largest carbon emitters and the most carbon intensive companies) and engage with companies on reducing carbon emissions/mitigate their climate risk and improving disclosure standards. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Carbon footprint for the investment portfolios will continuously be measured and reported. **Targets for reference period:** See above under PAI 1, on our climate strategy and target to reduce owned emissions.
	3. GHG intensity of investee companies	GHG intensity of investee companies	1045.04 tonnes per million EUR sales (coverage 60%)	905.99 tonnes per million EUR sales (coverage 66%)	Revenue has increased for many of the investee companies in the portfolio, along with their GHG emission decreasing resulting in a lower GHG intensity for the total portfolio. Primary data sources are Sustainalytics, Trucost, and Stamdata. GHG intensity is a measure of tonnes CO2 equivalents per million EUR of revenue.	**Actions taken:** As described above under PAI 1, Storebrand Asset Management has set a target to reduce carbon intensity of investments in listed equity, publicly traded corporate debt and real estate, by 32% between 2018 and 2025. Carbon intensity per fund is publicly disclosed and compared to benchmarks. In line with Storebrand Asset Management's PAI statement, our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green). We have done an initial gap analysis and assessed the data quality of the PAI indicators, including whether we deem the data coverage to be of good quality and coverage, in order to be able to assess companies as red/yellow/green. GHG intensity is one of the indicators where quality and coverage of data is good enough, so we have identified red, yellow, and green flagged companies based on the 'GHG intensity' indicator. This information is made available to the portfolio managers. By the end of the reference period, we had surpassed the 32% emissions intensity reduction target for 2025, reaching 50% reduction for equity and fixed income and 44% for real estate. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** The red-flagged companies will be further analyzed, and depending on the risk of negative impact, mitigation through engagement or potential risk-based exclusion will be considered as a final resort. During 2024, we will set new emissions reduction targets for 2030. **Targets for reference period:** See above under PAI 1, on our climate strategy and target to reduce owned emissions.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.74% (coverage 56%)	6.29% (coverage 63%)	Primary data sources are Sustainalytics, Trucost, and Stamdata. Expressed as a percentage of total AUM.	**Actions taken:** Storebrand AM will not invest in companies that derive more than 5 % of their revenues from coal, companies that derive more than 5% of their revenue from oil sands-based activities or companies that deliberately and systematically work against the goals and targets enshrined in the Paris Agreement. For specific funds we apply additional fossil criteria as follows: will not invest in companies: which derive 1) more than 5% of their revenue from the production or distribution of fossil fuels as well as 2) relevant services to fossil fuel operations, or 3) whose fossil reserves exceed 100 million tonnes of CO2. We define 'production and distribution' to include all activities linked to the extraction, refining and transport or distribution of fossil fuels. Companies that manufacture products derived from fossil fuels such as plastic, asphalt or synthetic rubber are not included. Public bodies such as states or local government entities are not within the scope of this criterion. Services are defined as any activity pertaining to the provision of relevant services to fossil fuel operations and other logistical activities relation to it. These include transportation, shipping and storage of fossil fuels. As of end of 2023, the additional fossil criteria applied to 47% of total AUM. Quarterly exclusions can be found here: Document library - www.storebrand.com For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Storebrand AM will continue to develop our understanding and assessment of climate transition and what this means for different sectors and for companies active in the fossil fuel sector. Ensuring continued compliance with exclusion criteria and develop our analysis and assessment in terms of climate transition. **Targets for reference period:** No companies flagged as in breach of this PAI to be eligible as a sustainable investment.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	Energy consumption: 56.71% (coverage 59%) Energy production: 0.81% (coverage 57%)	Energy consumption: 58.98% (coverage 65%) Energy production: 0.99% (coverage 61%)	Primary data sources are Sustainalytics, Trucost, and Stamdata. Metric expressed as a percentage of total AUM.	**Actions taken:** Companies involved in non-renewable energy production are excluded under the additional fossil fuel exclusion criterion, as described above. **Planned actions:** The data availability and coverage are low for the non-renewable energy consumption indicator. Hence, we are looking at how this could be improved and how we could address these data gaps going forward. The transition to renewable energy consumption and production is a central element in our climate engagement theme, and we address it through engagement and voting. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Targets for reference period:** No target set yet for the next reference period.

Table 1					
Principal adverse impact indicator	**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Sector A: 0.3 Sector B: 4 Sector C: 13.8 Sector D: 5.6 Sector E: 0.6 Sector F: 0.2 Sector G: 0.1 Sector H: 2.8 Sector L: 0.3	Sector A: 0.25 (coverage 100%) Sector B: 3.41 (coverage 96%) Sector C: 12.18 (coverage 98%) Sector D: 4.12 (coverage 55%) Sector E: 0.34 (coverage 99%) Sector F: 0.57 (coverage 96%) Sector G: 0.05 (coverage 97%) Sector H: 1.5 (coverage 95%) Sector L: 0.43 (coverage 100%)	Primary data source is Sustainalytics and Trucost. Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector.	A: Agriculture, forestry and fishing B: Mining and quarrying C: Manufacturing D: Electricity, gas, steam and air conditioning supply E: Water supply; sewerage; waste management and remediation activities F: Construction G: Wholesale & retail trade; repair of motor vehicles H: Transportation and storage L: Real estate activities **Actions taken:** The transition to zero net zero energy consumption is a central element in our climate engagement theme, and we address it through engagement and voting. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** We will continue to consider energy consumption as a data point for company analysis, engagement and voting. **Targets for reference period:** No target set for the next reference period.

Table 1

Principal adverse impact indicator		Metric	Impact 2022	Impact 2023	Explanation	Actions taken, actions planned, and targets set for the next reference period
Bio-diversity	**7. Activities negatively affecting biodiversity sensitive areas**	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	6.49% (coverage 56%)	5.27% (coverage 62%)	Primary data source is Sustainalytics and and Stamdata. Metric expressed as a percentage of total AUM.	**Actions taken:** Biodiversity is one of three focus areas for engagement. We expect companies to mitigate impacts on biodiversity and ecosystems through commitments at the organizational level and respect international agreements such as the UN Convention on Biological Diversity. Companies depending on or impacting biodiversity and ecosystems should integrate relevant nature-related risks and opportunities into their corporate strategy, risk management and reporting, in accordance with the recommendations of the Task Force on Nature-related Financial Disclosure (TNFD). In Storebrand's Nature policy from 2022, we committed to: • Screening portfolios and setting targets • Active ownership and stakeholder engagement • Reducing our negative and increasing positive impact • Disclose and promote transparency As a first step to assess the impacts and dependencies of our investments on nature and biodiversity, we screened our portfolios using the tool ENCORE in 2022. This sector-level analysis gave insights for the development of our engagement strategy. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com In 2022, we expanded our exclusion criteria to reduce our negative impact on biodiversity and valuable and vulnerable ecosystems. The activity-based criteria cover: • Mining operations that conduct direct marine or riverine tailings disposal • Companies that operate in ecologically sensitive areas: Companies that derive more than 5 % of their revenues from Arctic drilling will be put on our observation list and closely monitored and engaged with based on our existing ownership. • Deep-sea mining Conduct-based exclusions of companies based on severe environmental damage (for example activities negatively affecting biodiversity sensitive areas) can be found here: Document library - www.storebrand.com **Planned actions:** Storebrand will give a priority to the most material sub-industries from the perspective of nature-related impacts to ensure that these companies are mitigating their potential negative impacts. We will continue to engage with companies individually and through Nature Action 100+. Storebrand will also seek improved data sources for assessing biodiversity impacts and dependencies of our portfolio. **Targets for reference period:** Storebrand have committed to assess impact on biodiversity, set targets and report on this by 2025.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Water	**8. Emissions to water**	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.4 tonnes per million EUR invested (coverage 3%)	0.98 tonnes per million EUR invested (coverage 5%)	The increase in tonnes of water generated is primarily due to one of the investee companies reporting data for 2023, but not reporting in 2022. Note that the data coverage for this indicator is very low. Primary data source is Sustainalytics and Trucost. Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average.	**Actions taken:** We address emissions to water both through our engagement on biodiversity (se above) and chemicals. Water pollution is a major driver of biodiversity loss as well as a threat to human health. Conduct-based exclusions of companies based on severe environmental damage (for example spills and emissions to water) can be found here: Sustainable investment review - www.storebrand.com For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** The data availability and coverage are low for the emissions to water indicator. We are looking at how this could be improved and how we could better address the data gaps going forward. **Targets for reference period:** No target set for the next reference period.
Waste	**9. Hazardous waste ratio**	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	10 tonnes per million EUR invested (coverage 21%)	8.4 tonnes per million EUR invested (coverage 53%)	The data coverage has increased quite drastically giving us better data quality, in addition, one of the investee companies has reduced their reported hazardous waste by 45%, resulting in the total KPI decreasing drastically. Sustainalytics, Trucost and Stamdata are the primary data sources on companies' hazardous waste ratio. The ratio is measured as a weightedaverage tonnes of emissions per mEUR invested.	**Actions taken:** In 2023, through Nature Action 100, we are engaging with 100 companies including companies within chemical, consumer goods and pharmaceutical sector, that might contribute to environmental pollution if not disposed properly. These companies are expected to set timely and necessary actions to address their impact on nature. In 2021, we initiated a collaborative engagement targeting the 50 companies ranked by ChemScore. ChemScore ranks the world's largest 50 chemical producers on their work to reduce their hazardous chemical footprint. It was developed in order to provide investors with better information to assess which companies have strong chemicals management strategies, and which do not. It is managed by ChemSec, an independent, Swedish non-profit committed to the development of sustainable chemicals use through dissemination of knowledge, collaboration and practical tools. In 2023, the investor group, coordinated and led by Aviva and Storebrand Asset Management, sent letters to the 50 companies that have been ranked in ChemScore, asking for greater transparency on the chemicals they produce, engagement with ChemSec and phase out of the most hazardous chemicals. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Continued engagement with chemical companies on the use of hazardous chemicals throughout 2024. The data availability and coverage are low for the hazardous waste indicator. We are looking at how this could be improved and how we could better address the data gaps going forward. **Targets for reference period:** No target set for the next reference period.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters						
Social and employee matters	**10. Violations of UN Global Compact principles and Organiza-tion for Economic Coopera-tion and Develop-ment (OECD) Guidelines for Multi-national Enterprises**	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1.2% (coverage 56%)	0.85% (coverage 62%)	Sustainalytics is the primary data source for this indicator. Storebrand will also make our own evaluations of identified breaches based on additional data providers try to engage with the companies to encourage corrective actions, and as a last resort exclude the company. In addition, we conduct additional in-house research and assessments in cases when information from data providers is missing, which may result in a risk-based sale of assets. Metric expressed as a percentage of total AUM.	**Actions taken:** Norm-based exclusions: Storebrand AM aims to not invest in companies that contribute to serious and systematic breaches of international law and human rights as well as for other environmental and governance criteria. See exclusion policy here. Companies will be excluded if the breaches are considered severe and the risk of a breach re-occurring is assessed as high. This has been the practice at Storebrand since 2005. The list of companies excluded as of December 2023 can be found here. In line with Storebrand Asset Management's PAI statement, our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green). We have done an initial gap analysis and assessed the data quality of all the PAI indicators, including whether we deem the data coverage to be of good quality and coverage, in order to be able to assess companies as red/yellow/green. We have identified red-flagged companies for some of the PAI indicators, including PAI 10, and this information on red flags has been made available to the portfolio managers. ***Risk-based sale of assets:*** We started implementing a risk-based sale of assets based on this PAI at the end of 2021 for certain high-risk sectors after identifying risk of forced labor in supply chains as a particularly severe salient issue. This has resulted in the exclusion of three companies so far. Out of the PAI red-flagged companies, two companies were identified in our actively managed funds, and these two companies have also been subject to engagement. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Ensuring continued compliance with our exclusion criterion and standards. The red-flagged companies will be reviewed and further actions to mitigate the risk/impact will be considered during the reference period, which may also result in the exclusion or risk-based sale of companies. **Targets for reference period:** No companies flagged as in breach of this PAI to be eligible as a sustainable investment. PAI red flagged companies in our actively managed fund will be prioritized for engagement.

Table 1						
Principal adverse impact indicator		Metric	Impact 2022	Impact 2023	Explanation	Actions taken, actions planned, and targets set for the next reference period
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and Guidelines for Multi-national Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	65.7% (coverage 53%)	54.08 % (coverage 61%)	Sustainalytics is the primary data source for this indicator. Metric expressed as a percent	**Actions taken:** The data availability and coverage for this indicator is medium. This is due to the fact that many companies still do not disclose grievance mechanisms. The screening for investee companies' potential lack of processes and compliance mechanisms to monitor compliance with UN Global Compact and OECD Guidelines is carried out by our data providers. Engagement with companies: Storebrand palliates this insufficient data by participating in collaborative initiatives such those by the World Benchmarking Initiative that aim to encourage companies to adopt such processes and compliance mechanisms and report specific data on them. In addition, Storebrand has mapped certain high-risk industries where there is a special need to push companies to adopt such mechanisms due to their exposure to human right risk and the severe negative human right impact. As a result, we have been focusing on resilient company supply chains in order to lift industry standards and encourage companies to adopt processes and compliance mechanisms. We do this in a collaborative manner with other investors for more leverage and through organizations such as the Investor Alliance on Human Rights, the PRI Advance initiative, and the Platform Living Wages Financials. Another area of increased risk for companies is conflict zones. In this context we are engaging with standard setters to contribute to guidelines on human rights due diligence for companies and investors. This is complemented by our engagement with companies facing these challenges. Storebrand has also been engaging together with other investors with EU policymakers to ensure a robust Corporate Sustainability Due Diligence Directive and a robust EU directive on Forced Labour among others For more information on how we work with engagements please see here. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.comNorm-based exclusions: As explained in the previous PAI, Storebrand aims to not invest in companies that contribute to serious and systematic breaches of international law and human rights. Often this is the case, due to the lack of policies and mechanisms to be in compliance with GC and OECD Guidelines. Companies will be excluded if the breaches are considered severe and the risk of a breach re-occurring is assessed as high. Quarterly exclusions can be found here: Document library - www.storebrand.com **Planned actions:** We will continue to engage with companies in order to mitigate this risk as well as divest from them if we see severe violations of human rights as a result of lack of policies and mechanism to monitor compliance in accordance with Storebrand international law and human rights standards. As we obtain better data, we will start measuring investee companies based on this indicator, which may lead to risk-based exclusions or mitigation by further engaging with investee companies if possible. **Targets for reference period:** No target set for the next reference period. Although a target for substantial alignment with UNGP is set for 2030.

Table 1						
Principal adverse impact indicator		Metric	Impact 2022	Impact 2023	Explanation	Actions taken, actions planned, and targets set for the next reference period
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	18% (coverage 2%)	13.4 (coverage 3%)	Sustainalytics and Stamdata are the primary data sources for this indicator. Note that the data coverage for this indicator is very low. The ratio shows the relative difference between the two genders pay.	**Actions taken:** The data availability and coverage for this indicator is very low. ***Norm-based exclusions:*** Storebrand AM aims to not invest in companies that contribute to serious and systematic breaches of international law and human rights as well as for other environmental and governance criteria. Companies will be excluded if the breaches are considered severe and the risk of a breach re-occurring is assessed as high. Severe and systematic gender discrimination is covered by our Storebrand standard and has in some instances resulted in exclusion. Quarterly exclusions can be found here: Document library - www.storebrand.com ***Voting:*** Storebrand AM prioritizes voting on key ESG issues in order to reduce the adverse sustainability impact of the companies it is invested in. One of the identified key ESG issues are gender equality, diversity and remuneration. Our goal is to vote at all meetings with ESG and/or shareholder resolutions on the agenda, including shareholder resolutions on gender pay gap. In 2023, we supported all 11 shareholder resolutions that were available to vote, requesting disclosure on gender pay gap. ***Sustainability rating:*** We calculate the Sustainability Score on over 4500 companies and base it on a 0-100 scale. It is comprised of two main building blocks, ESG risks and SDG opportunities. The SDG opportunities section of the score particularly includes data on Gender Equality, which is integrated in the sustainability score for the companies we have coverage. Storebrand has also engaged with EU policy makers together with other investors so that gender as a theme is explicitly included as a theme in the EU Corporate Sustainability Due Diligence Directive. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** The data availability and coverage are low for the gender pay gap indicator. We are looking at how this could be improved until full coverage on this indicator is available. **Targets for this reference period:** No target set for the next reference period.

Table 1					
Principal adverse impact indicator	**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
13. Board gender diversity	Average ratio of female to male board members in investee companies	26.9% (coverage 60%)	35.34 (coverage 65%)	Sustainalytics, Trucost, Equileap and Stamdata are primary data sources for this indicator. The ratio is calculated as number of female board members divided by the number of male board members, expressed as a percentage. The increase in the percentage is due to more reported data.	**Actions taken:** In line with Storebrand Asset Management's PAI statement, our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green). We have done an initial gap analysis and assessed the data quality of all the PAI indicators, including whether we deem the data coverage to be of good quality and coverage, in order to be able to assess companies as red/yellow/green. We have identified red-flagged companies for some of the PAI indicators, including the PAI 13, and this information on red flags has been made available to the portfolio managers. ***Voting:*** Storebrand prioritizes voting on key ESG issues in order to reduce the adverse sustainability impact of the companies it is invested in. One of the identified key ESG issues are gender equality, diversity and remuneration. Our goal is to vote at all meetings with ESG-related and/or shareholder resolutions. Storebrand Asset Management typically votes against management in situations such as quality of board and its members, including lack of diversity. We generally vote against or withhold from the chair of the nominating committee if the board lacks at least one director of an underrepresented gender identity. Our default voting policy has different minimum thresholds for board diversity in different markets, such as 40% in continental Europe, 33% in the UK. See ISS Sustainability voting policy for more details ***Sustainability rating:*** We calculate the Sustainability Score on over 4500 companies and base it on a 0-100 scale. It is comprised of two main building blocks, ESG risks and SDG opportunities. The SDG opportunities section of the score particularly includes data on Gender Equality from Equileap, which is integrated in the sustainability score for the companies we have coverage on and includes data on board diversity. For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** The red-flagged companies will be further analyzed, and depending on the risk of negative impact, mitigation through engagement will be considered. We will continue with our voting strategy in order to mitigate adverse impact and risk in relation to this. The red-flagged companies will be reviewed and further actions to mitigate the risk/impact will be considered during the reference period. **Targets for reference period:** Aim to vote against the nomination committee and/or re-election of board members at all red flagged companies for this PAI.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0% (coverage 56%)	0% (coverage 62%)	Sustainalytics and Stamdata are the primary data sources for this indicator. Expressed as a percentage of total AUM.	**Actions taken:** Storebrand will not invest in companies involved in the development and/or production of controversial weapons; testing of controversial weapons; production of components to be used exclusively for controversial weapons; or stockpiling and/or transfer of controversial weapons. This criterion includes but is not limited to landmines, cluster munitions, nuclear weapons and biological and chemical weapons. The definitions and scope are in line with the corresponding conventions and norms, including but not limited to the Convention on Cluster Munitions (CCM), the Ottawa Treaty/Mine Ban Treaty and the Non-Proliferation Treaty. The Storebrand Standard - Storebrand Quarterly exclusions can be found here: Document library - www.storebrand.com For more information on how our engagements during the reference period were linked to the PAIs, see the online engagement dashboard on our website: Active ownership - www.storebrand.com **Planned actions:** Ensuring continued compliance with the exclusion criterion. **Targets for reference period:** No investments in companies in breach of this PAI.
Indicators applicable to investments in sovereigns and supranational						
Environ-mental	**15. GHG intensity**	GHG intensity of investee countries	257 (coverage 100%)	214.41 tonnes per million EUR GDP of investee countries (coverage 100%)	Sustainalytics and Trucost are the primary data sources for this indicator. GHG intensity of investee countries is a measure of tonnes CO2 equivalents per million EUR of GDP. Only governmental and municipality issued investments covered in this metric.	**Actions taken:** As of now we have not used GHG intensity in our analysis of country risk on sovereigns. **Planned actions:** We will integrate GHG intensity into our sovereign risk analysis when we have sufficient data coverage and quality. We are considering the possibility of including the asset class of sovereign bonds in 2030 climate target. **Target for reference period:** No target set for the next reference period.
Social	**16. Investee countries subject to social violations**	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0 countries (coverage 100%)	0 countries (coverage 100%)	Sustainalytics is the primary data source for this indicator. Only governmental and municipality issued investments covered in this metric.	**Actions taken:** Storebrand will not invest in government bonds or state-controlled companies from countries that are systematically corrupt, systematically suppress basic political and civil rights or are subject to sanctions imposed by the UN Security Council. Storebrand can neither invest in companies owned or controlled by a country excluded from sovereign bond investments. To access this, we are currently using data from the World Bank, Transparency International, Freedom House, and UN and EU sanctions lists. In addition to this we make country risk analysis based on current events. **Planned actions:** Ensuring continued compliance with the exclusion criterion. **Target for reference period:** No investments in sovereign bonds in countries in breach of this PAI, including no investments in state owned and controlled companies from these states.

Table 1						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
					Indicators applicable to investments in real estate assets	
Fossil fuels	**17. Exposure to fossil fuels through real estate assets**	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0 % (coverage 100 %)	0 % (coverage 100 %)	We do not invest in real estate (RE) assets involved in the extraction, storage, transport or manufacture of fossil fuels.	No action needed, the policy and practice of making no such investments continue.
Energy efficiency	**18. Exposure to energy-inefficient real estate assets**	Share of investments in energy-inefficient real estate assets	80 % (coverage 100 %)	66 % (coverage 100 %)	Area- and value-based share of RE investments in Norway and Sweden with a third-party EPC (energy performance certificate) class C or lower. National rating schemes are used and have different EPC thresholds.	Good energy performance of buildings is focused in both acquisition and standing investments in order to mitigate adverse environmental impact and risk. In the screening and Due Diligence of the acquisition process, the actual or potential EPC class and corresponding costs are assessed. In the property management phase improvement targets and measures are included in business plans and operations based on detailed energy monitoring, assessments and the upgrading opportunities of the building life cycle. On portfolio level the distribution of EPC classes is monitored and targeted, and efforts balanced against total carbon emissions (in particular scope 3 embodied carbon) and economic returns.

Additional climate and other environment-related indicators

In addition, we consider the voluntary indicator relating to deforestation measured as share of companies without a policy to address deforestation (Table 2, indicator 15. Deforestation) and additional PAIs regarding real estate (table 2, indicator 18, 19 & 20). We also consider the voluntary indicator supplier code of conduct measured as share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour) (Table 3, indicator 4. Lack of a supplier code of conduct).

Table 2						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Water waste and material emissions	**15. Deforestation**	Share of investments in companies without a policy to address deforestation	66.39% (coverage 56%)	74.68 (coverage 61%)	Sustainalytics is the primary data source for this indicator. Expressed as a percentage of total AUM.	**Actions taken:** Our ambition is to have an investment portfolio that does not contribute to deforestation by 2025. We take the following actions to achieve this: • Portfolio screening and risk assessment • Active ownership (engagement and voting) • Exclusion • Disclosure and promotion of transparency See further detail in our Deforestation Policy. Storebrand recently completed our third portfolio screening, using the new Forest IQ database for the first time. based on the Forest 500 and Trase databases. Of the 2100 companies and financial institutions included in Forest IQ, Storebrand has exposure to 135 companies and 114 financial institutions with varying degrees of deforestation risk. Using Forest IQ rankings, Storebrand assesses companies' progress towards eliminating deforestation and prioritizes companies for active ownership engagement, individually and through collaborative initiatives like Finance Sector Deforestation Action. (FSDA). In line with Storebrand Asset Management's PAI statement, our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green). We have done an initial gap analysis and assessed the data quality of the PAI indicators, including whether we deem the data coverage to be of good quality and coverage, in order to be able to assess companies as red/yellow/green. We have identified red-flagged companies based on the 'Deforestation' indicator, and this information has been made available to the portfolio managers. Out of our total ongoing engagements during the reference period, 106 of the engagements were linked to the PAI on deforestation. Planned actions: The data availability and coverage are low for the deforestation indicator. The indicator is narrow in scope, so we are using several other data sources to assess companies' exposure to and management of deforestation risk. At the moment our in-house methodology gives a better understanding of deforestation impact than the PAI indicator. However, we are using data on the PAI deforestation indicator to enhance of our analysis. The red-flagged companies will be reviewed and further actions to mitigate the risk/impact will be considered during the reference period. Targets for reference period: Storebrand will revise screening methodology to incorporate more forest risk commodities and establish guidelines for voting against directors of red-flagged companies.

Table 2						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Other principal adverse indictors applicable to investments in real estate assets						
Green-house gas emission	**18. GHG emissions consump-tion and production**	Scope 1 GHG emissions generated by real estate asset (tCO2e/yr)	77 (coverage 87 %)	119 (coverage 88 %)	Location-based in-use operational emissions calculated from sc. 1 stationary combustion of fossil fuels and leakage of refrigerants, sc. 2 district heating and electricity consumption, and sc. 3 waste handling and water consumption, for all standing investments in Norway and Sweden with a whole-building approach. Development properties not included. For electricity a Nordic mix emission factor is used, for district heating and cooling local / actual emission factors are used.	Through the environmental management system of assessing status, setting targets, implementing measures and monitoring results at asset level, all input factors of the GHG emissions are targeted: energy, waste and water. This is a continuous improvement process consisting of smaller operational measures and larger investments yielding greater results. The systematic approach is designed to realize the SBTi-validated science based target of 71 % reduction in 2030 compared to 2019 (market-based emissions). Medium term target is -29 % from 2019 to 2025 (location based). Total absolute emissions increased 7 % from 2022 to 2023. As the main underlying input-factor energy consumption was reduced by 4 %, the emission increase is mainly due to a general increase in emission factors for electricity (outside of our control). In addition, there has been an increase in floor area (portfolio). Emission intensity thus has increased only 4 % (kg CO2e/m2 heated floor area)
		Scope 2 GHG emissions generated by real estate asset (tCO2e/yr)	5065 (coverage 96 %)	5329 (coverage 97 %)		
		Scope 3 GHG emissions generated by real estate asset (tCO2e/yr)	1194 (coverage 73 %)	1317 (coverage 73 %)		
		Total GHG emissions generated by real estate asset (tCO2e/yr)	6336 (coverage 90 %)	6764 (coverage 92 %)		
Energy consump-tion	**19. Energy consump-tion intensity**	Energy consumption in kWh of managed real estate assets per square meter (kWh/m2-yr)	168 (coverage 96 %)	161 (coverage 97 %)	Temperature-corrected energy consumption metered on-site with whole-building approach (including tenant consumption) divided by gross heated floor area for all standing investments in Norway and Sweden. Development properties not covered.	Reduction of energy intensity with individual asset targets goes hand in hand with the emissions reduction target over. Detailed energy audits and integration of measures in property business plans have been intensified in 2021-2023. This in addition to close (minimum weekly) energy monitoring (automated system) with detection of functional errors and improvements in building automation system, e.g. temperature settings for energy systems. Reduction targets are set individually for building renovation and energy upgrade projects in order to reduce energy cost and consumption and reduce GHG emissions according to our Science Based Targets for 2030.
Waste	**20. Waste production in operations**	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract	0% (coverage 100 %)	5.27% (coverage 62%)	All standing investments and development projects have extensive waste sorting facilities and recycling contracts.	The policy of targeting and monitoring the improvement of facility waste production and sorting for recycling, or extracting material from the waste cycle to reuse, is basic both in standing investments and in development projects. Improvement targets are set annually for assets that underperform in sorting rate.

Table 3						
Principal adverse impact indicator		**Metric**	**Impact 2022**	**Impact 2023**	**Explanation**	**Actions taken, actions planned, and targets set for the next reference period**
Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters						
Social and employee matters	**4. Lack of a supplier code of conduct**	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	6.3% (coverage 56%)	6.8 (coverage 61%)	Sustainalytics is the primary data source for this indicator. Expressed as a percentage of total AUM.	**Actions taken:** *Norm-based exclusions:* Storebrand aims to not invest in companies that contribute to serious and systematic breaches of international law and human rights. We see this is often the case within their supply chains. Thus, companies will be excluded if the breaches are considered severe and the risk of a breach re-occurring is assessed as high. Quarterly exclusions can be found here: Document library - www.storebrand.com *Engagement with companies.* We continued with our engagement regarding resilient company supply chains as explained above. We do this in a collaborative manner with other investors for more leverage on issues such as forced labor, child labor, unsafe working conditions and/or living wages and through organizations such as the Investor Alliance on Human Rights, the PRI and the Platform Living Wages Financials. Our engagement work on this topic has been further reinforced by the Norwegian Transparence law (Åpenhetsloven) which we have been using as requirement for Norwegian companies and companies with operations in Norway. More information on how we work with engagements please see here . We also encourage companies to report on these issues to benchmarks such as Know-the-Chain and the Corporate Human Rights Benchmark Initiative. **Planned actions:** We will continue our focus on resilient supply chains under the theme reducing inequalities and just transition as one of our three main engagement themes. In addition, we will continue to exclude companies if we see severe violations of human rights in accordance with Storebrand international law and human rights standards. **Target for reference period:** When better data is available for this indicator, start measuring all investee companies based on this indicator, in order to identify red, yellow or green flagged companies, which may lead to mitigation by further engaging with investee companies if possible, or risk-based sale of assets.

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

Storebrand Asset Management prioritizes and addresses these adverse impacts by using several combined strategies that involve:

- Screening and excluding companies that do not live up to Storebrand's (minimum) investments standards based on international norms and conventions and/or companies that are involved in the production of certain unsustainable products.
- Engaging with companies to discuss these adverse impacts with the aim to improve corporate behavior and thus reducing the adverse impact.
- Integrating sustainability risk ratings in investment decisions to avoid or invest less in companies with high-risk sustainability rates and prioritize or invest more in companies with low sustainability risk
- Risk-based sale of assets for assets with a high risk of involvement in activities with severe adverse impacts such as those identified as Principle Adverse Impacts (PAIs) in EU regulation

Although principal adverse impacts (PAIs) are already being addressed and integrated in a general way by following the approach described above, SAM will be enhancing further integration for mitigation of PAIs, as outlined below.

SAM has been identifying adverse impact in its portfolios for over a decade, and thus there is an overlap between PAI indicators, and our general work carried out to mitigate risk. Regarding the identification of the specific PAI indicators, SAM will be monitoring these PAI indicators including the selected Additional Indicators on an ongoing basis as data becomes available from data providers. Our methodology is to identify PAI laggards (red), PAI intermediate performers (yellow) and PAI leaders (green) so that risk can be avoided, and more capital can be allocated to more sustainable companies and solution companies.

- **RED:** Those companies identified as PAI laggards will be further analyzed by the Risk and Active Ownership team and may result in exclusion depending on the risk and severity of the negative impact identified and the total cumulative negative impact identified across all PAI indicators.
- **YELLOW:** PAI intermediate performers will also be further analyzed with the aim to mitigate adverse impact through engagement.
- **GREEN:** In addition, the analyzed PAI data will be further integrated in financial decisions with the aim of allocating more capital to PAI leaders, and thus lift the sustainability value of our funds.

More generally, once the PAI laggards (red) are identified, portfolio managers have the opportunity and responsibility to further integrate this already categorized PAI data in order to further mitigate risk and allocate more capital into more sustainable companies. This is to be done by selecting different methodologies. These may include: 1. "PAI worst in class approach" where companies scoring poorly on a PAI indicator can be avoided; 2. "High-risk sector only PAI approach", where only companies belonging to high risk sectors and performing poorly on a PAI indicator may be avoided, or 3. "Integrated PAI risk rating approach," where companies are avoided based on the integrated average PAI indicator score or a combination of critical material PAI indicators. A strategy may also be developed for optimization of investments in companies that are identified as PAI leaders [5-10 %] as part of the PAI class/sector/rating PAI analysis.

For more information see our policies here.

Data inputs and limitations

The process is data driven with both internally and externally collected data which are assessed by our Risk and Ownership team. The Risk and Ownership team is responsible for selecting data providers that deliver relevant data enabling the organization to perform these screens. Data providers may vary over time and are described in the standards pertaining to each product or practice. Data is primarily collected from external data providers, namely Sustainalytics, Trucost, Stamdata and ISS.

If data gaps are identified, Storebrand will initiate a dialog with the different entities to collect more information. Since we receive data from different providers there are instances where the information is inconsistent. In these cases, the Risk and Ownership will conduct our own additional research and analysis on the company and potential issue. In any case we will contact the company to verify the information and the data providers to hear why the data differs.

The principle adverse impact indicators are accounted for based on the underlying securities' data availability. As the data quality and availability improves, we will be considering a range of methods to account for these and mitigate adverse impact. These methods will be applied taking into consideration the type of strategies that best fit specific portfolios' sustainability objectives, as well as Storebrand's general sustainability strategies that apply across all asset classes.

Engagement policies

The Storebrand Group believes in exercising our rights as shareholders. We employ two main ways of doing this: voting at shareholder meetings or direct company engagement by expressing our views, in writing or through dialogue with the company's management, advisers or Board of directors. Both methods can effectively address ESG concerns and provide complementary signals to companies on where we stand on important issues.

The decision to engage with companies is based on our assessment of the significance of a particular matter, holding size, scope to effect change and opportunities to collaborate with other investors.

Storebrand Asset Management has prioritised three thematic engagement themes and two cross cutting themes for the 2024-2026 period. Our prioritised themes align with the Sustainable Development Goals and with our own corporate commitments, as outlined in our Sustainable Investment Policy. These are: Climate change, nature, human rights, and the cross-cutting themes are; policy dialogue and sustainability disclosure.

Please see our engagement and voting policy for more information here.

References to international standards

SAM follows, among others, the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Guidelines on Responsible Business Conduct for Institutional Investors. We support the UN declaration of Human Rights, ILOs Conventions, the UN environmental conventions and the UN anti-corruption convention. We are also guided by the OECD Due Diligence Guidance for Responsible Business Conduct.

Being part of the Storebrand Group, SAM has essentially signed and complies with the following international codes of conduct and standards:

- UN Principles for Responsible Investment (PRI). PRI is the leading international initiative in responsible investment for financial institutions.
- UN Global Compact. Commitment to adapt strategies and operations to universal principles on human rights, work, environment and anticorruption and to take measures that promote positive societal development.
- Task Force on Climate-related Financial Disclosures (TCFD). TCFD is a leading international initiative whose task is to produce recommendations for measuring and taking measures against climate change.
- Climate Action 100+. Climate Action 100+ is an international initiative with the task of influencing the companies that cause the largest emissions of greenhouse gases and getting them to take the necessary measures.
- Net Zero Asset Owner Alliance. An ambitious climate leadership group with the commitment to ensure that our investment portfolios have net zero greenhouse gas emissions by 2050 at the latest.
- Tobacco-Free Finance Pledge
- Montreal Pledge
- Portfolio Decarbonization Coalition
- CDP

Historical comparison

SKAGEN AS has been a part of the Storebrand Group since 2017 and has until November 2023 operated under exemptions as a separate management company and subsidiary of SAM. As a result, SKAGEN AS was dissolved through a parent-subsidiary merger of SKAGEN AS and SAM, and after the merger SAM became manager of SKAGEN mutual funds. Under the new structure, SKAGENs business consist of managing SKAGEN mutual funds under an outsourcing agreement with SAM. Data for SKAGEN funds are therefore included in SAMs PAI statement as of the year 2023. As a result, the AUM for 2023, as opposed to 2022, has increased and can thus be seen in the numbers for this year's report. In particular, the PAIs regarding the total CO2e emissions has seen a rapid increase from 2022 to 2023 due to increased AUM reported on.

Moreover, we see that the data coverage has increased for most of the PAIs from 2022 to 2023 resulting in better and more accurate data. The use of more reported data than estimated data will therefore affect the PAIs. We would however like to see better data coverage, as it would be easier and more accurate to make comparisons year by year.