



Human Rights Policy and Responsible Business Conduct at Storebrand

In effect for: All employees, as well as contract employees, substitutes, students, persons employed in training or labor-market programs

Adopted by: Chief Executive Officer Storebrand ASA

Approved: 28.06.2022

Last edited: 28.06.2022

Document owner: Chief Executive Officer Storebrand ASA

Table of Contents

Scope of this document	4
Human Rights Policy	4
Employees	5
Investments	5
Suppliers and contractors	5
The Norwegian Transparency Act	5
Other relevant documents affecting how the Group works with human rights	7
For documents affecting our specific operations, e.g., how we incorporate human rights considerations into our investments, please see the relevant subchapters below.	
Responsible business conduct and human rights at Storebrand	7
Responsible business conduct and human rights for our people	7
Responsible business conduct and human rights in our supply chain and third-party relations	9
Responsible business conduct and human rights in our investments.	10
Storebrand Asset Management Human Rights Due Diligence and Assessment Approach.	10
Storebrand Group Sustainable Investment Policy	10
Identifying, managing and mitigating actual and potential adverse impacts in our portfolios	10
Continuously monitoring our investments for controversies in breach of the Storebrand Standard and excluding companies in breach	10
Assessing specific Principal Adverse Impacts within our investments as required by the EU Sustainable Finance Disclosure Regulation	11
Mapping portfolios to identify industries with largest investment exposure against salient human rights risks inherent to these industries and prioritization of engagement to mitigate the risk.	12
Main actions for reducing the risks of breaches related to human rights and decent working conditions in our investments	12
Responsible business conduct and human rights in new business relations (mergers, acquisitions, joint ventures, etc.)	13
Appendix: Responsible business conduct and human rights per legal entity of the Storebrand Group	13
Responsible business conduct and human rights in Storebrand Asset Management AS.	14
Responsible business conduct and human rights in Storebrand Asset Management AS: Equity and Bonds	14
Responsible business conduct and human rights in Storebrand Asset Management AS: Real Estate	14
Responsible business conduct and human rights in Storebrand Asset Management AS: Infrastructure	16
Responsible business conduct and human rights in Cubera Private Equity AS.	16
Responsible business conduct and human rights in SKAGEN AS.	18
Responsible business conduct and human rights in Storebrand Forsikring AS (Insurance)	19
Responsible business conduct and human rights in Storebrand Bank ASA (Bank)	20
Responsible business conduct and human rights in Storebrand Boligkreditt AS (Mortgages).	22
Responsible business conduct and human rights in Storebrand Livsforsikring AS (Life Insurance).	22
Responsible business conduct and human rights in SPP Pension & Försäkring AB (Life Insurance)	23
Responsible business conduct and human rights in Storebrand Eiendomsfond Invest AS (Real Estate Fund Invest), Storebrand Eiendom Trygg AS (Real Estate Safe), Storebrand Eiendom Vekst AS (Real Estate Growth), Storebrand Eiendom Utvikling AS (Real Estate Development)	24
Responsible business conduct and human rights in Storebrand Pensjonstjenester AS (Pension services).	24
Responsible business conduct and human rights in Norsk Pensjon AS (Norwegian pension).	25
Responsible business conduct and human rights in Storebrand Facilities AS	25
Responsible business conduct and human rights in Storebrand Helseforsikring AS (Health insurance)	26
The Universal Declaration of Human Rights (Abbreviated)	27

Scope of this document

Human Rights Policy and Responsible Business Conduct at Storebrand is a supplement to our [Code of Conduct](#), which is adopted by the Board of Directors in Storebrand ASA and implemented in all legal entities of Storebrand.

The intent of this document is to transparently inform our stakeholders how we are working with human rights and decent working conditions. It outlines how we in Storebrand are working to reduce the risks of breaches related to human rights and decent worker conditions amongst our employees, in our value chain and in our investments. It covers our current processes and how we are preparing for the implementation of the Norwegian Transparency Act (LOV-2021-06-18-99). For further details per legal entity of the Storebrand Group, please refer to the appendix of this document.

It is important to note that this document does not cover our report according to the Transparency Act's (LOV-2021-06-18-99) "Section 5. Duty to account for due diligence", which will be disclosed on our website starting from 2023 and onwards.

For further details related to our work on human rights and decent working conditions, please contact our press and media department at puls@storebrand.no. Storebrand will handle all inquiries according to deadlines set out in the Norwegian Transparency Act. Information will be given within the deadline of three weeks unless stated otherwise.



Human Rights Policy

The Storebrand Group is committed to conducting its business with respect for all internationally recognized human rights including those set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. The Group is dedicated to consistently following the United Nations Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact. Storebrand is also committed to following the OECD guidelines for Multinational Enterprises and the United Nations Principles for Responsible Investments (PRI) and the Principles for Sustainable Insurance (PSI).

Storebrand is also committed to contribute to the achievement of the Sustainable Development Goals (SDGs). Storebrand Group has identified two sustainability goals where we can have the most substantial impact through our business activities, namely SDG 8 - decent work and economic growth, and SDG 5 – Gender Equality. Both SDGs are important from a responsible business conduct and human rights perspective.

Our Human Rights Policy and the [Code of Conduct](#) set out the principles for how we relate to our employees, partners, contractors and suppliers, as well as the companies in which we invest. Storebrand is committed to preventing violations to, and respecting international human rights, hereunder; Forced Labor, Child Labor, Freedom of Association, the Right to Collective Bargaining, Workers' Health and Safety, Living Wages and Maximum Working Hours, Adequate Living Standards, Equal Remuneration, Non-Discrimination, Indigenous and Tribal Peoples Rights. The list is inexhaustive. The Executive Vice President of Sustainability, Communications and Public Affairs is responsible for the implementation of this policy, reporting externally, and reporting to the Board on human rights issues.

EMPLOYEES

Storebrand is a signatory to the UN Global Compact along with the ILO Declaration on Fundamental Principles and Rights at Work, and performance is reported regularly in Storebrand's annual report and in the report on progress to the UN Global Compact. We are committed to diversity and non-discrimination based on gender, ethnicity, nationality and sexual orientation. Storebrand cooperates closely with labor unions and employee representatives and has established both internal and external whistle-blower channels where employees anonymously can report cases.

INVESTMENTS

Storebrand applies a standard for all assets under management by the Group; the Storebrand standard. This standard clearly states that Storebrand will not invest in companies involved in serious violations of human rights (Analysis Criterion: Human Rights) and international law (Analysis Criterion: International Law). Storebrand's screening for violations of human rights is based on the Universal Declaration of Human Rights, made operational through core UN and ILO conventions. Storebrand is a signatory to the United Nations' Principles for Responsible Investments (PRI) and reports regularly on its investment activities through the PRI.

SUPPLIERS AND CONTRACTORS

Storebrand's procurement and supplier policies are part of Storebrand's commitment to sustainability and human rights. Suppliers are required to inform Storebrand whether they have ethical and human rights guidelines and whether they comply with the ten principles of the UN Global Compact. Suppliers of goods and services should have the appropriate tools to ensure high standards of commitment to social and environmental issues.



THE NORWEGIAN TRANSPARENCY ACT

The Norwegian Transparency Act (LOV-2021-06-18-99) enters into force in Norway July 1st, 2022. The Act promotes Norwegian companies' respect for fundamental human rights and decent working conditions and enforces due diligence procedures in accordance with the OECD Guidelines for Multinational Enterprises. Companies shall assess both their own operations and operations they indirectly are part of through their supply chain and relations, and be transparent about procedures, findings and mitigations.

Storebrand welcomes the requirements of the act which will lead to increased transparency in businesses operating in Norway and globally. In Storebrand, we are committed to implement the Transparency Act (Lov-2021-06-18-99) and to conduct our due diligence in accordance with the OECD Guidelines for Multinational Enterprises. Our framework will therefore follow these six steps (retrieved from The Transparency Act (LOV-2021-06-18-99), "Section 4. Duty to carry out due diligence").

- a) embed responsible business conduct into the enterprise's policies
- b) identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward, or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners
- c) implement suitable measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritizations and assessments pursuant to (b)
- d) track the implementation and results of measures pursuant to (c)
- e) communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (c) and (d)
- f) provide for or co-operate in remediation and compensation where this is required.

Storebrand's due diligence procedure will be conducted iteratively, and we will continuously gain experience and relevant insights through our work, which in turn will enhance our ability to uncover future human rights risks in our different business areas and be able to mitigate these.

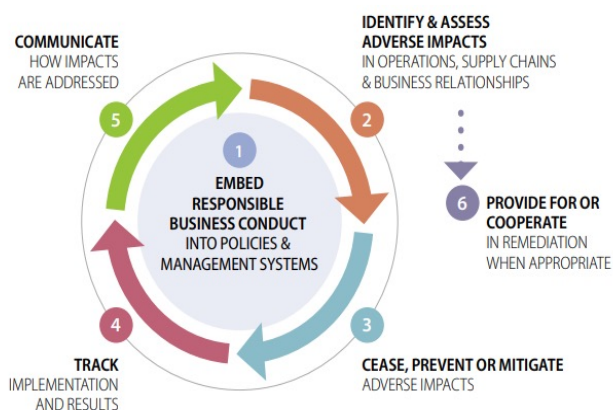


Figure 1: OECD's due diligence framework, which is the basis for the Norwegian Transparency Act. Source: "OECD Due Diligence Guidance for Responsible Business Conduct".

OTHER RELEVANT DOCUMENTS AFFECTING HOW THE GROUP WORKS WITH HUMAN RIGHTS

At Storebrand, human rights considerations are implemented across all business areas, in a multitude of processes and governance mechanisms, and integrated in relevant policies, guidelines and other documents, few of which are described below:

- **[The Storebrand Procurement Policy](#)**
 - Storebrand's procurement policy is embedded in Storebrand's sourcing principles, applies to the entire Storebrand Group and is applied in practice by Storebrand's Group procurement department
 - The sourcing principles contains vendor requirements and applies to all procurement of goods and services
- **[Ethics in Storebrand \(Code of Conduct\)](#)**
 - Ethical rules are a part of Storebrand's governing documents and set the framework for how we behave and what Storebrand stands for
 - In addition to this document, all employees must know our internal rules, guidelines, and routines, as well as the laws and regulations that set limits for our business
- **[Data protection guidelines](#)**
 - Storebrand has dedicated data protection officers and data protection advisers who serve both as advisers and controllers of handling of personal data and ensuring Storebrand complies with all privacy legislation.
 - Privacy is a human right as described in the European Convention on Human Rights. The European privacy legislation is unified in the General Data Protection Regulation (GDPR), the European privacy law that ensures that handling of personal data is similar across borders in all countries in the European Union and in the European Economic Community. The GDPR is created and developed based on amongst other European Convention on Human Rights Article 8. The law aims to protect and defend every persons right to privacy. As Storebrand complies with GDPR and all other privacy laws, our handling of personal data is in accordance with the European Convention on Human Rights and should contribute to secure all customers (and others) human rights regarding privacy.

For documents affecting our specific operations, e.g., how we incorporate human rights considerations into our investments, please see the relevant subchapters below.

Responsible business conduct and human rights at Storebrand

The following section of this document outlines how we work with human rights and decent working conditions within:

- A. Our people
- B. Our supply chain and third-party relations
- C. Our investments
- D. New business relations

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS FOR OUR PEOPLE

We continuously strive to be a responsible employer, and to provide our employees with a workplace where all employees are treated with respect, feel safe, are given equal opportunities, and where diversity is seen as a catalyst for innovation and for better understanding business risks and opportunities. We firmly believe that our organization should reflect the composition and range of our customers and the markets in which we operate. Diversity and equality are prerequisites to achieve this. We aim for a culture where all employees experience job satisfaction and engagement through meaningful work, good management, a motivating working environment, development opportunities and trust in the management.

In order to achieve this, we are dedicated to:

- Diversity and non-discrimination based on gender, ethnicity, nationality and sexual orientation.
- Endorse the right to freedom of association and collective bargaining through close cooperation with labor unions and employee representatives.
- Maintain effective internal and external whistle-blower channels where cases can be reported anonymously and are resolved fairly.
- Conduct employee engagement surveys on a monthly or bi-weekly basis to measure well-being, experienced equality, commitment to work tasks, perception of sustainability and the experience of self-determination, amongst others.
- Encourage a good work-life balance for all employees and accommodate our employees' needs for flexible working hours.
- Ensure a safe and health-promoting workplace as expressed through our [HSE Policy](#) and targets and provide employees with both training and proper means to participate in and contribute to improvements.

Storebrand is a signatory to the UN Global Compact along with the ILO Declaration on Fundamental Principles and Rights at Work, and performance is reported regularly to the public in Storebrand's annual report, the report on progress to the UN Global Compact, as well as in our reporting towards our Eco-Lighthouse certification. Eco-Lighthouse is a Norwegian standard for companies to demonstrate their environmental efforts and social responsibility. All these documents are available on our webpage in the [sustainability library](#).

Procedures and relevant policies in place:

- Employee selection committee oversees that internal hires and promotions are in line with guidelines.
- Annual calibration of pay to ensure fair salaries and hinder e.g., gender inequalities. Process is audited by third party and processed at the AGM
- Diversity and inclusion committee, consisting of six employees

nominated by the business. The committee shall raise awareness and increase the understanding of the importance of a diverse and inclusive working environment where people feel they belong.

- Rules and regulations regarding tariff pay.
- Annual HSE risk review.
- In-house physiotherapy, chiropractor, and trainers.
- Clear internal policies on working hours, in compliance with the Norwegian labor and employment law.
- Close cooperation with labor and trade unions.
- Dedicated data protection officer oversees data protection guidelines.
- Clear internal policies on rights to vacation and working hours, in compliance to the Norwegian labor and employment law.
- Relevant documents
 - [Diversity and Equal Opportunities Policy](#)
 - [HSE Policy for the Storebrand Group](#)
 - [Whistleblowing function](#)
 - [Eco lighthouse certification](#)

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN OUR SUPPLY CHAIN AND THIRD-PARTY RELATIONS

Storebrand has a significant annual purchasing volume, where we have seen an increase in outsourcing of business processes in recent years. Based on Storebrand's strategy and focus on sustainability, we see this as an area where we can be a driver for change and cooperate with our suppliers to achieve an increased focus on sustainability throughout our supply chain. We conduct our procurement according to our [procurement policy](#), which applies to the entire Storebrand group. We also cross reference all potential suppliers to our [exclusion list](#).

We are dedicated to working proactively with human rights and decent working conditions in our supply chain and third-party relations. Going forward, we are prioritizing the following set of actions:

- Include social and environmental criteria in our assessment of potential and existing suppliers and track their performance over time. More information about our approach and all the questions we ask in tender processes can be found [here](#).
- Weigh sustainability (E, S & G) minimum 20% in all new supplier selections with an increased focus on human rights and decent working conditions.
- Initiate pre-contractual assessment of new suppliers, where certain sector and/or country affiliation trigger additional human rights considerations before any agreement may take place.
- Map our suppliers on sector, sub-sector, where the company operates and what human rights policies, guidelines, and/or commitments they have. Going forward this information will be mapped in the pre-contractual assessment process.
- Require a formal commitment from all suppliers to adhere to the core standards of the UN Global Compact by signing the Storebrand Standard Annex for Sustainability (they also verify that potential subcontractors adhere to Un Global Compact's core standards).
- Require a formal commitment from all suppliers to ensure that employees in its own organization as well as the employees of potential subcontractors that are directly involved in the delivery of services to Storebrand do not have wages or working conditions that are inferior to what follows from applicable laws and regulations, by signing the Storebrand Standard Annex for Sustainability. The

supplier is committed to ensure the right to collective bargaining for its own employees.

- Conduct regular assessments of adverse human rights risks through surveys to uncover how our suppliers work to reduce their risks for any adverse human rights impacts and how they deal with breaches. We then select and prioritize suppliers for further analysis, interviews and mitigating actions based on risks uncovered in the surveys. Further, we will monitor suppliers with significant human rights risks and, if needed, initiate site visits where we have reason to believe there are significant risks of human rights violations or a lack of routines to reduce the risks of violations.
- Continuously assess human rights risks in our supply chain and implement suitable mitigating actions where necessary.

Since 2020, Storebrand has increased its focus on sustainability across the supply chain, with a strengthened focus on climate-related issues. We have been conducting surveys across major suppliers (over 800.000 NOK excl. VAT). Going forward, these surveys will further emphasize aspects related to human rights and decent working conditions.

These surveys will form a baseline status of our suppliers' efforts on sustainability, including on indicators such as diversity, gender equality and human and labor rights, through e.g., adherence to core standards of the UN Global Compact.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN OUR INVESTMENTS

Storebrand Asset Management Human Rights Due Diligence and Assessment Approach

Storebrand Asset Management performs its human rights risk due diligence based on the UN Guiding Principles on Business and Human Rights (the Protect, Respect and Remedy Framework) and the guidance on the implementation of the Framework as described in the OECD Guidelines for Responsible Business Conduct for Institutional Investors. This work has been reinforced by recent regulation in the EU requiring focus on specific Principal Adverse Impacts across industries (EU Sustainable Financial Disclosure Regulation as well as upcoming EU Directive for Corporate Sustainability Due Diligence). General human rights due diligence requirements from the Norwegian Transparency Act also complement our approach. For a better understanding of the implementation of the process described below, please see Storebrand Asset Management Human Rights Due Diligence in Investments which is publicly available [here](#). Since we invest in all sectors, salient issues may vary from sector to sector. Therefore, we do not focus on a few human rights issues when mapping our portfolios in order not to miss any potentially negative human rights impacts. For specific rights gathered in international norms, conventions, declarations on human rights and international law that we expect companies to respect, please see Storebrand criteria for human rights and international law.

Storebrand Group Sustainable Investment Policy

Storebrand Group Sustainable Investment Policy describes how we work with responsible investments and requires observance of international norms and conventions within human rights, the environment, governance/anti-corruption as well as guidelines such as OECD Guidelines. The policy also describes implementation methods such as due diligence,

portfolio screening, exclusions, active ownership and integration. The policy is approved at the highest management level at Storebrand Asset Management and is publicly available [here](#).

Identifying, managing and mitigating actual and potential adverse impacts in our portfolios

We identify, manage and mitigate actual and potential adverse impacts by using several methods. These are the main ones:

1. Continuously monitoring our investments for controversies in breach of the Storebrand Standard and excluding companies in breach.
2. Assessing specific Principal Adverse Impacts within our investments as required by the EU Sustainable Finance Disclosure Regulation.
3. Mapping portfolios to identify industries with largest investment exposure against salient human rights risks inherent to these industries and prioritization of engagement to mitigate the risk.

Continuously monitoring our investments for controversies in breach of the Storebrand Standard and excluding companies in breach

We assess if companies breach the [Storebrand Standard](#), our minimum requirement to invest in a company continuously. The Storebrand standard describes in detail international norms and conventions within human rights, the environment, governance/anti-corruption as well as guidelines that we expect companies to follow. Established in 2005, the standard applies to all of Storebrand's internally managed funds and pension portfolios, as well as all externally managed funds. The standard does not distinguish between passive and active investments and applies to all asset classes. Furthermore, it has clearly defined analysis criteria for [Human Rights](#) and [International Law](#).

We monitor all companies in our investment universe, over 4000 companies, for potential breaches of our Storebrand Standard through our external data providers Sustainalytics and ISS/Ethix. We conduct additional research for all alerts from Sustainalytics and ISS/Ethix that have a medium to a high severity score.

In cases where companies systematically breach our standard, Storebrand will use its position as an investor to engage companies in dialogue and seek to achieve improvements. If dialogue does not lead to positive change within a reasonable amount of time, a company may be excluded from investment. Exclusion is regarded as a last resort in cases where companies fail to demonstrate the will to improve. A company will also be excluded when subsidiaries controlled by the company, typically through ownership of 50 percent or more, are in breach of the Storebrand Standard. Our list of excluded companies is publicly available [here](#).

Storebrand also screens and excludes companies based on the production of certain products: These products are tobacco, both production and distribution (right to health), and controversial weapons (right to health and life). In addition, companies that contribute extensively to climate change and that have a significant revenue from unsustainable products like coal, oil sands and palm oil may also be excluded, based on revenue thresholds. The impacts of climate change on ecosystems and human settlements are undermining access to clean water, food, shelter, and other basic human needs as well as interfering with livelihoods and displacing people from their homes.

Assessing specific Principal Adverse Impacts within our investments as required by the EU Sustainable Finance Disclosure Regulation

We continuously assess any potential adverse environmental, social or governance impact from activities in investee companies. For companies with heightened risk of potential adverse impact, we will make an in-depth analysis of the issue and decide on any further action, such as engagement or recommendation for exclusion.

Specific social Principal Adverse Impacts we focus on are: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises; Unadjusted gender pay gap; Board gender diversity; Supplier Codes of Conduct. For further information, please see our Principal Adverse Impact Statement [here](#).

Mapping portfolios to identify industries with largest investment exposure against salient human rights risks inherent to these industries and prioritization of engagement to mitigate the risk

At least once a year, we carry out a mapping of all portfolios to identify potential human rights risks in the industries we are the most exposed to. A risk assessment of the most salient human rights issues within these industries is conducted so we can inform and prioritize our proactive engagements with these industries. The rationale is to avoid or prevent controversies, but also to lift industry human rights standards, and therefore mitigate human rights risks related to our investments.

Information on prioritized proactive engagements can be found [here](#). Please note that we are also engaging with companies on other human rights themes, although they do not appear as the main prioritized themes.

Please also see our quarterly Sustainable Investment Review, the latest of which can be found [here](#).

Main actions for reducing the risks of breaches related to human rights and decent working conditions in our investments

To reduce the risks of breaches related to human rights and decent working conditions, we are dedicated to:

- Ensure that all investments adhere to the requirements set out in the Storebrand Standard for product-based and conduct-based exclusions.
- Continuously monitor all companies in our investment universe (over 4000 companies) for breaches to our Storebrand Human Rights and International Law Standard, hereunder human rights violations. All alerts from our service providers (Sustainalytics and ISS/Ethics) with a severity score of medium or high are analyzed further, for possible engagement and/or exclusion.
- Assess all potential breaches to our Storebrand Human Rights and International Law Standard using our internally developed assessment table, which includes elements such as; type of violation, seriousness, company responsibility, geographical/time context, the company's signs of improvement, and risk of occurrence.
- Map and assess portfolios for specific social Principal Adverse

Impacts as required by EU SFDR and mitigate their impact.

- Map portfolios to identify industries with largest investment exposure against salient human rights risks inherent to these industries and prioritize engagement to mitigate the risk.
- Use engagement, both reactive and proactive, as a tool to mitigate and prevent potential human rights risks.
- Utilize voting to influence companies on human rights issues, as well as use shareholders resolutions/communications to company Boards and management, etc. to escalate engagements that are not progressing satisfactorily.
- Employ our sustainable investment tools such as investing in solution companies to shift investments from higher risk companies to less risk or solutions companies.
- Calculate the sustainability score of companies based on our in-house methodology and integrate this in our investment decisions and our engagements with companies.
- Track progress of all engagements and exclusions to assess which strategies work, and which do not.
- Provide public information about all our exclusions on our [website](#), as well as public information about our [main engaging activities](#).
- Please also see our quarterly Sustainable Investment Review, the latest of which can be found [here](#).

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN NEW BUSINESS RELATIONS (MERGERS, ACQUISITIONS, JOINT VENTURES, ETC.)

From time-to-time Storebrand conducts processes with the aim of acquiring or merging with a company, or alternatively establishing a joint venture. In all cases, and before final agreements are signed and a transaction is completed, a thorough due diligence is carried out. In the due diligence process Storebrand ensures engagement from relevant in-house resources, e.g., from the Legal department and the Risk & Compliance department. In addition, external expertise on both legal and compliance are engaged in most processes. A legal review of a business is an integrated part of the due diligence process. This includes a review of compliance with all relevant laws and regulations, including the Transparency Act. For the case of a target company not being subject to the Transparency Act, the review will cover a compliance gap analysis.



Appendix: Responsible business conduct and human rights per legal entity of the Storebrand Group

The following section of this document outlines how we work with human rights and decent working conditions within:

(English translations in *Italic*)

- A. Storebrand Asset Management AS
 - a. Equity and Bonds
 - b. Real Estate
 - c. Infrastructure
- B. Cubera Private Equity AS
- C. SKAGEN AS
- D. Storebrand Forsikring AS (*Insurance*)
- E. Storebrand Bank ASA (*Bank*)
 - a. Storebrand Boligkreditt AS (*Mortgages*)
- F. Storebrand Livsforsikring AS (*Life Insurance*)
 - a. SPP Pension & Försäkring AB (*Life insurance*)
 - b. Storebrand Eiendomsfond Invest AS (*Real Estate Fund Invest*), Storebrand Eiendom Trygg AS (*Real Estate Safe*), Storebrand Eiendom Vekst AS (*Real Estate Growth*), Storebrand Eiendom Utvikling AS (*Real Estate Development*)
 - c. Storebrand Pensjonstjenester AS (*Pension services*)
 - d. Norsk Pensjon AS (*Norwegian pension*)
- G. Storebrand Facilities AS
- H. Storebrand Helseforsikring AS (*Health Insurance*)

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND ASSET MANAGEMENT AS

Please refer to the section "Responsible business conduct and human rights in our investments" in the main part of this document, outlining how we generally work within Storebrand Asset Management AS and our most fundamental policies and standards, such as Storebrand Asset Management Human Rights Due Diligence and Assessment Approach, Storebrand Group Sustainable Investment Policy and the Storebrand Standard. For further details per asset class, please refer to the sections below.

Responsible business conduct and human rights in Storebrand Asset Management AS: Equity and Bonds

Please refer to the section "Responsible business conduct and human rights in our investments", which covers how we work within Equity and Bonds.

Responsible business conduct and human rights in Storebrand Asset Management AS: Real Estate

The work to ensure due diligence framework for Human Rights and decent working conditions in Real Estate has been based on risk assessment of five different value chains in the business. We have carried out a survey of our suppliers, business relations and partners and assessed the risk that some of them either themselves or through subcontractors /supply chain have unacceptable working conditions or conditions that violate fundamental human rights.

The following tasks are in progress:

1. Anchor accountability in the boards of Storebrand Real Estate's subsidiaries and plan for the business: We participate in the work organized from the Storebrand Group in addition to working with our own value chains.
2. Guidelines and corporate culture: Review our policies and update where needed.

3. System for handling the duty of disclosure: Storebrand Real Estate will be able to report and answer questions through the Group's information channel. Storebrand Real Estate will assist in responding to such inquiries. In addition, Storebrand Real Estate will review its own web pages and incorporate reporting into its sustainability reports, etc.
4. Mapping/risk analysis: Storebrand Real Estate has created a spreadsheet where we have divided suppliers and partners into five categories. The division is based on different value chains. We try to identify where the risk is highest for human rights violations and unacceptable working conditions by scoring different suppliers and subcontractors. The largest suppliers are here risk assessed separately.

The following categories are established:

- Suppliers on construction projects and real estate development
- Management providers
- Other suppliers
- Tenants
- Investors

Measures implemented in Storebrand Real Estate:

1. We have included a separate binding point on violations of human rights and decent working conditions in our standard tenancy agreements section 27 which will now apply to all new tenancies.
2. Our three main contractors have accepted that the requirements of the Transparency Act will be included in our framework agreements dated December 9th, 2020.
3. We require our contractors and other suppliers that they cannot have more than two subsections with subcontractors to limit the risk and to increase the transparency and control.
4. We carry out audits of our suppliers and their subcontractors related to HSE, living conditions and pay conditions.
5. We carry out analyses of our suppliers related to the risk of human rights violations and unacceptable working conditions and consider how we can prevent such risks.

Procedures and relevant policies in place

- Audits of our suppliers.
- Site visits for high-risk suppliers.
- All suppliers and business partners must sign the Storebrand Standard Annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.

Responsible business conduct and human rights in Storebrand Asset Management AS: Infrastructure

The Storebrand Infrastructure Fund (the Fund) is restricted from investing in assets that do not comply with Storebrand's ESG policy at the time of investment. Storebrand has partnered with two strategic partners that are strongly aligned with Storebrand in terms of ESG policies. Each potential investment goes through a thorough ESG due diligence process prior to investment, which covers the protection of social and human rights. The Fund's Portfolio Manager considers the

findings of the ESG due diligence and will avoid any investment that violates Storebrand's ESG policy.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN CUBERA PRIVATE EQUITY AS

Cubera Private Equity has the following practices in place to minimize the risk of human rights breaches in its organization and value chain:

Suppliers

Cubera is a financial advisory company whose suppliers deliver normal products and services as should be expected for an ordinary office environment. These include but are not limited to office premises, cleaning and maintenance, office supplies and groceries, IT services, accounting and payroll, compliance and legal services, and data systems and intelligence.

The majority of products and services acquired by Cubera are of such nature that the risk of human rights breaches, from Cubera's or the supplier's side alike, is considered to be low or negligible. Some services, such as cleaning and maintenance services, do however carry a higher risk of breaches related to labor arrangements and working conditions, merely based on the track record of the activity type. Cubera acquires cleaning and maintenance services from authority-approved and/or certified suppliers. Accounting, IT and HR/payroll services are delivered by the Storebrand Group. Compliance, legal and other administrative services are delivered by reputable firms and the risk of human rights breaches is low for these activities. Finally, Cubera purchases data and intelligence used for investment and market analysis from highly reputable global firms who have publicly stated their commitment towards relevant human rights-related goals. Cubera will monitor its suppliers at least by verifying annually that the suppliers have in place formal commitments to respect human rights (policies, statements, procedures etc.) Such a verification will also be part of the due diligence process when selecting new suppliers. Cubera will follow up adverse impacts it becomes aware of in its due diligence process or otherwise.

Cubera's ethical guidelines require that Cubera provide a safe environment for suppliers of office services to carry out their work. Cubera has established that the risk of injury and threat to health and safety is low, given that the premises are high-standard offices where services such as cleaning and maintenance are easily carried out. Cubera also requires that the suppliers of the office spaces in the Oslo and Stockholm locations are of good repute and have a sufficient service level to secure good working conditions for the users. Cubera's requirements are further laid down in the risk management system's procedures related to outsourcing and purchasing.

Employees

All Cubera employees are required to follow Cubera's ethical guidelines and to comply with applicable laws and internal control policies and procedures. Cubera's ethical guidelines state that Cubera should provide a working environment for employees to thrive and excel. Cubera does not discriminate against employees or candidates based on their background, sexual orientations or beliefs, other than educational background and prior experience to the extent that this is relevant for their position. Cubera provides competitive compensation schemes and

an office environment which should pose minimal risk to their health and safety. Cubera views the risk of human rights breaches towards the company's employees to be low. Any observed breach can be reported by the employees using the Storebrand Group's whistleblowing process, which has been made available to all employees.

Products

Cubera delivers investment advisory services in the form of investment recommendations to its fund clients. Every investment recommendation features the result of ESG due diligence carried out in accordance with established proprietary processes and tools and governed by the ESG Policy. Such due diligence includes evaluating the risk of human rights breaches, the same way as other environmental, social or governance risks are evaluated. Cubera offers investment recommendations to funds with two distinct investment strategies: Primaries and Secondaries.

Primary investments, i.e., making commitments to new private equity funds, entail not knowing the company portfolio in which the portfolio fund will invest. For this reason, ESG due diligence focuses on analyzing the external manager's track record and ensuring that the manager has in place policies which contribute to minimizing the risk of human rights breaches in their investments. Furthermore, Cubera expects the managers to have in place policies and procedures to secure that such breaches do not occur within their organization. Beyond being an undisputed social objective, preservation of human rights in the workplace lowers the risk of operational deficiencies (e.g. turnover and organizational instability) which could put the management of Cubera's investments at risk. To the extent that the manager's policies do not adequately coincide with Cubera's requirements, Cubera will make best efforts to enter into side letter agreements with the intention of enhancing alignment between the manager's future actions and Cubera's policies.

Secondary investments, i.e. acquiring existing private equity fund positions, require an ESG due diligence of the acquired portfolio. According to the same principles applicable to primary investments and laid out in the ESG Policy, Cubera analyzes ESG risks and opportunities at the portfolio company level and at the manager level. The risk of human rights breaches is evaluated as part of the ESG due diligence.

Because the investees of the Cubera funds are many and different in terms of geography, strategy and scope, Cubera has not established which are the greatest human rights breach risks on a general basis, but this exercise is carried out on a case-by-case basis as an integral part of the investment analysis and recommendation process.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN SKAGEN AS

SKAGEN AS (SKAGEN) is committed to conducting its business whilst respecting all internationally recognized human rights and decent working conditions. SKAGEN adheres to the Storebrand overarching policies like the Storebrand Human Rights Policy, the Storebrand Standard, the Storebrand Procurement policy, Ethics in Storebrand (Code of Conduct), and also has its own corporate guidelines and procedures to ensure that all aspects of the business actively work to mitigate the risk of breaches of human rights and decent working conditions.

Fund management:

SKAGEN is an active fund manager and has a long history of engaging directly with the portfolio companies to impact their approach to human rights and decent working conditions. SKAGEN adheres to the Storebrand Standard, with its clear and comprehensive set of exclusion criteria and principles related to portfolio investments. Please refer to the section "Responsible business conduct and human rights in our investments" regarding the Group initiatives. SKAGEN also has its own set of internal procedures and processes that operationalize our commitment to integrating human rights and decent working conditions in the portfolio management, as outlined in SKAGEN's Sustainable Investment Policy.

SKAGEN's internal Front Office Routine for ESG Integration Strategy sets out the procedures and due diligence that are conducted to ensure that the Sustainable Investment Policy is executed in a correct manner. All portfolio companies are routinely monitored through a quarterly ESG screening control process. Furthermore, SKAGEN has been a member of the UN-backed initiative The Principles for Responsible Investment (UN PRI) since 2012, committing the company to its six principles of implementing ESG factors to contribute to develop a more sustainable global financial system.

Operations:

SKAGEN's major contracts are entered into on Group level and are handled through the sourcing department. The SKAGEN-specific agreements are being amended to be compliant with the Transparency Act through relevant clauses, addendums and declarations. During the autumn of 2022, SKAGEN will complete a risk analysis of its suppliers and business partners, as well as a due diligence review in accordance with the Storebrand Group routines.

In 2019, SKAGEN selected three of the UN's Sustainable Development Goals as focus areas for our corporate efforts, two of which relate to human rights: SDG 5 (Gender Equality) and SDG 8 (Decent work and economic growth). They both pertain to SKAGEN not only as an employer, but also as guidelines for the expectations we have towards our suppliers and business partners. SKAGEN became a signatory to the ten principles of Global Compact in 2020, thus committing to supporting and respecting international human rights within the company's influence.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND FORSIKRING AS (INSURANCE)

Storebrand Insurance is committed to contribute to the achievement of the Sustainable Development Goals (SDGs). Storebrand Group has identified two sustainability goals where we can have the most substantial impact through our business activities, namely SDG 8 - decent work and economic growth, and SDG 5 - Gender Equality. Both SDGs are important from a responsible business conduct and human rights perspective. For our insurance business, this is relevant in two ways; 1) in the way we treat our clients equally, promote safety and good health, and respect their data privacy, and 2) how we work with our partners in claims settlements within our two main business lines, housing and motor insurance. Both construction and auto repair shops are perceived to pose potentially high human rights risks, and we seek to minimize these.

In order to achieve this, we are dedicated to:

- Integrate sustainability criteria (ESG), in line with our commitments through the Principles for Sustainable Insurance, into our different insurance business lines and their relevant underwriting criteria.
- Provide products and services that provide our customers with an increased sense of safety, that promotes and motivates for healthy lifestyle choices and incentivizes positive change, and helps reduce social exclusion or otherwise negligence of disadvantaged groups.
- Ensure that all claims cases are unbiased and that all our customers receive just treatment.
- Guarantee that we are GDPR compliant, and handle data in a manner that makes our clients confident that their privacy is respected. Our handling of data shall be ethical and responsible, and we are transparent on potential breaches, both publicly and directly to our customers.
- Continuously engage and monitor our network of partners for claims handling.

In 2017, Storebrand Insurance terminated all previous agreements with car repair shops, with the purpose of building a more robust supplier network with good coverage in terms of geographical area, in line with Storebrand's customer portfolio. The ability to influence fewer, more significant partners in terms of their work on sustainability, hereunder human rights and social dumping, was also an important factor.

Storebrand's use of contract partners has increased from less than 10% to over 80% in the last 3 years. Of course, controlling the claims volume has been important to improve our cost structure, but also to increase the bargaining power by being able to set clear requirements for partners. We are now in a position where, when renegotiating existing and entering into new agreements, we can impose requirements on suppliers with regard sustainability and responsible business conduct.

In addition, we have acquired good data quality on our repairs, which means that we can report back to the suppliers to a greater extent on our expected level of customer satisfaction. This has placed us in a position where it is possible for Storebrand to require that a supplier must have documented ESG/EHS certification as an environmental lighthouse or similar, or must commit to attain this within a given period. We work actively to ensure that the suppliers who make a proven choice about sustainability are prioritized when it comes to cooperation with Storebrand Insurance.

Procedures and relevant policies in place

- Full transparency in claims cases and settlement rationale/calculations.
- Employment of rule based digital handling of claims at a large scale.
- Sustainability weighted minimum 20% in all new business partner selections.
- Baseline survey to all suppliers and business partners on their work on sustainability to inform further efforts.
- All suppliers and business partners must sign Storebrand's standard annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND BANK ASA (BANK)

Storebrand Bank ASA is committed to contribute to the achievement of the Sustainable Development Goals (SDGs). Storebrand Group has identified two sustainability goals where we can have the most substantial impact through our business activities, namely SDG 8 - decent work and economic growth, and SDG 5 – Gender Equality. Both SDGs are important from a responsible business conduct and human rights perspective. For Storebrand Bank ASA this is relevant in the way we treat our clients equally, provide sustainable investment and financial solutions, and respect their data privacy.

To achieve this, we are dedicated to:

- Provide products and services that offer our customers sustainable financial solutions, including financing, savings and investment, that help them satisfy basic housing needs and fulfill future plans and dreams.
- Ensure that all loan applications are handled unbiased and that all our customers receive just treatment.
- Perform customer due diligence measures, transaction monitoring, and PEP and sanctions lists screening to fight financial crime and terrorism.
- Guarantee that we are GDPR compliant, and handle data in a manner that makes our clients confident that their privacy is respected. Our handling of data shall be ethical and responsible, and we are transparent on potential breaches, both publicly and directly to our customers.
- Continuously engage and monitor our suppliers and business partners.

In May 2022, Storebrand Bank ASA's subsidiary, Storebrand Boligkreditt AS, issued a 5.5 billion NOK green covered bond. This provides our investors the opportunity to support our vision of a positive impact on society and the environment, while concurrently having sound financial quality. Storebrand Bank ASA will continue to integrate sustainability criteria (ESG) into our different business lines and relevant policies.

Procedures and relevant policies in place:

- Compliancy with relevant laws and regulations.
 - MIFID II (framework, routines, product management etc.).
 - The lending regulation ("Utlånsforskriften") and Financial Contracts Act (Finansavtaleloven).
 - The Personal Data Act (Personopplysningsloven).
 - The Anti-Money Laundering Act.
- Transparency in process and rationale/calculations.
- Authorization of advisers (FinAut) and employee training courses.
- Dedicated data protection officer oversees [data protection guidelines](#).
- Information security awareness training for all employees.
- Extended information security and privacy training for management.
- Clear restrictions on customer data sharing across business units.
- Continuous focus on identifying and implementing suitable measures to prevent corruption.
- Risk assessment, KYC-measures, transaction monitoring and sanction/PEP-list screening.
- Mandatory courses for all employees to be completed each year related to financing of terrorism, money laundering and corruption.

- Sustainability weighted minimum 20% in all new business partner selections.
- All suppliers and business partners must sign Storebrand's standard annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.
- Baseline survey to all suppliers and business partners on their work on sustainability to inform further efforts.

Responsible business conduct and human rights in Storebrand Boligkreditt AS (Mortgages)

Storebrand Boligkreditt AS is a wholly owned subsidiary of Storebrand Bank ASA (parent bank). The company is a mortgage credit institution and has a concession from the Financial Supervisory Authority of Norway to issue covered bonds (OMFs). Assets consist primarily of securitized mortgages that are purchased from Storebrand Bank ASA. Storebrand Bank ASA manages the mortgages on behalf of Storebrand Boligkreditt AS. This means that the business processes are similar to the parent bank described above except investment advisory, and with the same underlying risks and mitigating actions.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND LIVSFORSIKRING AS (LIFE INSURANCE)

Storebrand Livsforsikring is the legal entity which provides our Guaranteed and Defined Contribution pension schemes, in addition to life insurance products. It also covers group support functions as People and HR services, Digital, CFO and Group Sourcing. Referring to our legal structure in our annual report, it covers the following Norwegian companies:

1. Storebrand Eiendomsfond Invest AS, Storebrand Eiendom Trygg AS, Storebrand Eiendom Vekst AS, Storebrand Eiendom Utvikling AS
2. Storebrand Pensjonstjenester AS
3. Norsk Pensjon AS (25% ownership)

Storebrand Livsforsikring procedures for human rights due diligence is covered by procedures presented in the following chapters

1. Our people – covers how we work in the group supporting functions
2. Our supply chain – covers how we work with group-wide suppliers
3. Storebrand Asset Management AS – covers how human rights are considered in our investments and hence the Guaranteed and Defined Contribution pension schemes

Storebrand Livsforsikring as a leading pension provider, has a great social responsibility, by ensuring that over 1 million Norwegian employees have a sustainable pension scheme and securing their financial future. Pension is a mandatory right for employees (with some exception). One of Storebrand Livsforsikring's tasks is to ensure that the employer acts in accordance with legislation and ensures its employees the pension they are entitled to. This is part of our work against work-related crime and anti-money laundering. Internal control and cooperation with authorities are some of the mitigating actions to prevent and detect work-related crime.

Another goal is to ensure equal advisory to customers and customer groups, to make sure that no customer is discriminated. This is enabled by having transparency in our Terms & Conditions. Digital sales and

advisory based on algorithms in compliance with guidelines are also mitigating actions. Customers shall have a fair and equal handling of claims. An example of a mitigating action is having transparency in the process of handling claims and rule-based (algorithms) claims.

For all part of our business, training of employees is also a valuable mitigating action.

Procedures and relevant policies in place:

- Guidelines and procedures in accordance with the Norwegian anti-money laundering act.
- Guidelines on advisory.
- Guidelines on handling of personal data.
- Guidelines on settlement of claims.
- Authorization of advisers (FinAut) and employee training courses.
- Responsible anti-money laundering reporting officer.
- Data privacy officer.
- Sustainability is weighted a minimum of 20% when selecting new suppliers and business partners.
- Baseline survey to all suppliers and business partners on their work on sustainability to inform further efforts.
- All suppliers and business partners must sign Storebrand's standard annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN SPP PENSION & FÖRSÄKRING AB (LIFE INSURANCE)

SPP Pension & Försäkring is the legal entity which provides life insurance products in Sweden.

It is covered by group support functions as People and HR services, Digital, CFO and Group Sourcing.

SPP Pension & Försäkring procedures for human rights due diligence is covered by procedures presented in the following chapters:

1. Our people – covers how we work in the group supporting functions
2. Our supply chain – covers how we work with group-wide suppliers
3. Storebrand Asset Management AS – covers how human rights are considered in our investments and hence the life insurance products of SPP Pension & Försäkring AB

SPP Pension & Försäkring AB as a Swedish pension provider, has a great social responsibility, by ensuring that our customers have a sustainable pension scheme and securing their financial future.

SPP Pension & Försäkring AB works against work-related crime and money laundering. Internal control and cooperation with authorities are some of the mitigating actions to prevent and detect work-related crime. Another goal is to ensure equal advisory to customers and customer groups, to make sure that no customer is discriminated. This is enabled by having transparency in our Terms & Conditions.

Customers shall have a fair and equal handling of claims. An example of a mitigating action is having transparency in the process of handling claims.

For all part of our business, training of employees is also a valuable mitigating action.

Procedures and relevant policies in place:

- Guidelines and procedures in accordance with the Swedish anti-money laundering act.
- Guidelines on advisory.
- Guidelines on handling of personal data.
- Guidelines on settlement of claims.
- Authorization of advisers (InsureSec) and employee training courses.
- Responsible anti-money laundering reporting officer.
- Data privacy officer.
- Sustainability is weighted a minimum of 20% when selecting new suppliers and business partners.
- Baseline survey to all suppliers and business partners on their work on sustainability to inform further efforts.
- All suppliers and business partners must sign Storebrand's standard annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND EIENDOMSFOND INVEST AS (REAL ESTATE FUND INVEST), STOREBRAND EIENDOM TRYGG AS (REAL ESTATE SAFE), STOREBRAND EIENDOM VEKST AS (REAL ESTATE GROWTH), STOREBRAND EIENDOM UTVIKLING AS (REAL ESTATE DEVELOPMENT)

These real estate subsidiaries are in practice managed by Storebrand Investment Management and follow the same procedures for Human Rights due diligence as in in the Real Estate asset class. Please see the relevant chapter "Storebrand Asset Management AS; Real estate", for further information.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND PENSJONSTJENESTER AS (PENSION SERVICES)

In addition to the pension services at Storebrand Livsforsikring (mentioned above), Storebrand Pensjonstjenester (SBP) offers a broad range of cost-efficient solutions to occupational pension funds both in the private and public sector as well as to the unfunded pension market. Our product line ranges from single deliveries on request up to complete system solutions with full administration and service desk. Our competencies and dedicated professional environment consist of actuaries, analysts, and system developers ensuring that our customers' needs are efficiently handled.

At SBP we follow the guidelines at Storebrand Group and complete the yearly courses to act in accordance with legislation for good business practice. The person appointed to the compliance advisor-role follows up and ensures that the courses are reviewed and completed by all the staff at SBP. Within our operational activities we always strive to comply with the legislation and guidelines set by the Norwegian authorities. As with our parent company, it is in our assignment that all members of a pension fund get the pension they are entitled to. Also, when handling the post-settlement of a member's pension rights, all foundational information is based on data reported by the employer to the Norwegian tax authorities which is part of the efforts we put in against money-laundering crimes.

Just like at Storebrand Livsforsikring, SBP also have the aim to ensure equal advises to customers and customer groups, to ensure that no customer is discriminated. This is ensured by having transparency in our terms & conditions. Digital sales and advises based on algorithms in compliance with guidelines is also mitigation action. Customers shall have a fair and equal handling of claims. A mitigation action is transparency in handling of claims and rule based (algorithms) claims handling.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN NORSK PENSJON AS (NORWEGIAN PENSION)

The purpose of Norsk Pensjon is to create and maintain a pension portal that will provide individuals with an overall overview of expected retirement pensions from various pension schemes, as well as apply portal and infrastructure solutions to other activities that are naturally associated with the main purpose. Norsk Pensjon is a joint ownership by the Norwegian pension providers. Finans Norge is an observing party.

Responsible business conduct and human rights in Storebrand Facilities AS To minimize the risk regarding human rights and decent working conditions, we have implemented the following set of actions:

- We cooperate closely with Sourcing when signing contracts with vendors.
- We have quarterly status meetings with all vendors that deliver personnel to our facilities.
- – We ensure that staff gets fair pay, vacation etc. that they are entitled to.
- We have continuous meetings with everyone involved in operations regarding regular service and periodic inspections, to make sure equipment and components are working as intended.

Procedures and relevant policies in place

- We work actively to reduce the number of business partners and increase engagement and monitoring efforts.
- All suppliers and business partners must sign Storebrand standard annex for suppliers, including UN Global Compact's 10 principles.
- Subcontractors are bound by the same contractual agreements as the main supplier, hereunder on terms related to third party contracted labor.
- We do not select suppliers which have been excluded from our investment universe based on not meeting minimum sustainability requirements, see full list [here](#).

The most important part of our procurement is external workers (cleaning, chef, janitor, security guard, etc.). Our goal is to make every one of them feel so welcome, that they work for Storebrand with pride. It is easier for us to give feedback to their companies, when we get direct feedback from "our" staff on site.

RESPONSIBLE BUSINESS CONDUCT AND HUMAN RIGHTS IN STOREBRAND HELSEFORSIKRING AS (HEALTH INSURANCE)

Storebrand Helseforsikring is a joint venture owned by Storebrand ASA and ERGO International AG. and is a provider of health insurance in Norway and Sweden.

Storebrand Helseforsikring is committed to conducting our business with respect for all internationally recognized human rights. We are

committed to diversity and non-discrimination based on gender, ethnicity, nationality, religion and/or sexual orientation. Employees are able to report incidents anonymously via established internal and external channels. We actively ensure that suppliers and partners respect human rights by enforcing our Procurement Policy.

We have established routines, processes and guidelines that safeguard the employees' security, rights and working environment. These routines make sure that the company has decent working conditions. All employees are responsible for common well-being and good working environment. The management is also responsible for a safe and secure workplace. Whistleblowing can be done internally or to an external party which ensures confidentiality and anonymity.

Storebrand Helseforsikring has appointed a Data Protection Officer (DPO) to ensure that the Company processes the personal data of its employees, customers, providers, or any other individuals in compliance with applicable data protection rules. We take the protection of our customers', partners', and own information value seriously. Through advanced security technology, built-in security solutions and processes, clear procedures and guidelines, requirements and monitoring of partners and suppliers, we make sure we are well prepared against constantly changing threats.

Sustainability is an integral part of our own and our owners core businesses. We work purposefully to reduce the environmental impact of our operations, through investments, through procurement and selection of partners. As a purchaser of goods and services we use our purchasing power to influence suppliers and partners to make the right choices to reduce environmental and climate impact. We demand sustainable deliveries and compliance with universal human rights and labor rights. A basic principle is that our customers shall be treated equally, in sense that no customer should receive favorable treatment at the expense of other customers.

Storebrand Helseforsikring aims to secure optimal, cost efficient, high quality and user-friendly procurement solutions, in accordance with international agreements, laws and regulations and internal policies. All procurement and sourcing shall be in accordance with best procurement practice and principles. Vendors shall have policies for sustainability and corporate governance and shall for example follow Ethical Trading Initiative Norway or other standards for corporate social responsibility (SA 8000 e.g.).

Storebrand Helseforsikring requires environmental responsibility from vendors of goods and services that have an impact on the Storebrand Helseforsikring's environmental footprint, waste, packaging, energy, emissions, and transport. The vendors shall be held accountable for environmental- and corporate social responsibility. Subject to equal terms, vendors that are certified will have priority, e.g.:

- ISO14001
- EMAS
- Miljøfyrtårn
- Svanemerket
- Grønt punkt

Vendors should also be able to account for lifecycle cost and environmental impact of their products and services.

The Universal Declaration of Human Rights (Abbreviated)

Article 1	Right to Equality
Article 2	Freedom from Discrimination
Article 3	Right to Life, Liberty, Personal Security
Article 4	Freedom from Slavery
Article 5	Freedom from Torture and Degrading Treatment
Article 6	Right to Recognition as a Person before the Law
Article 7	Right to Equality before the Law
Article 8	Right to Remedy by Competent Tribunal
Article 9	Freedom from Arbitrary Arrest and Exile
Article 10	Right to Fair Public Hearing
Article 11	Right to be Considered Innocent until Proven Guilty
Article 12	Freedom from Interference with Privacy, Family, Home and Correspondence
Article 13	Right to Free Movement in and out of the Country
Article 14	Right to Asylum in other Countries from Persecution
Article 15	Right to a Nationality and the Freedom to Change It
Article 16	Right to Marriage and Family
Article 17	Right to Own Property
Article 18	Freedom of Belief and Religion
Article 19	Freedom of Opinion and Information
Article 20	Right of Peaceful Assembly and Association
Article 21	Right to Participate in Government and in Free Elections
Article 22	Right to Social Security
Article 23	Right to Desirable Work and to Join Trade Unions
Article 24	Right to Rest and Leisure
Article 25	Right to Adequate Living Standard
Article 26	Right to Education
Article 27	Right to Participate in the Cultural Life of Community
Article 28	Right to a Social Order that Articulates this Document
Article 29	Community Duties Essential to Free and Full Development
Article 30	Freedom from State or Personal Interference in the above Rights