

# Policy for responsible investments

# 1 Purpose and scope

The purpose of the policy is to ensure that Protector Forsikring ASA is a responsible investor and owner.

That Protector shall be a responsible investor is incorporated in the investment mandate and in the investment strategy. This policy describes the company's approach to responsible investments.

This policy forms the basis for responsible investment practices in the company and is applicable to all investments and all asset classes and is to be operationalized for each asset class in an appropriate manner.

## 1.1 Definition of a responsible investor

A responsible investor seeks to integrate sustainability risks and factors in their investment activities and active ownership. Integrating sustainability risks and factors can be both ethically and financially justified.

Sustainability risks are environmental, social or governance-related factors or circumstances, as well as issues related to human rights, combating corruption and bribery, that may have an actual or possible negative impact on the value of the investment or commitment should they occur.

As providers of capital, asset owners set the tone for stewardship and may influence market practices.

## 1.2 Importance of Protector being a responsible investor

Over time Protector seeks to achieve the best possible combination of risk and return at the same time as the investments are made in a responsible manner. Protector's owners and customers expect us to act responsibly, and the company recognizes the impact its investments may have on society.

Protector wants to take part in a sustainable value creation together with the investees. Therefore, their business models must be based on responsible and sustainable business practices.

# 2 Relevant governing documents

This policy is a part of the company's governance system and has to be viewed in relation to Protector's policy and principles for risk management and the company's policy for sustainability management. This document elaborates on principles for sustainability management set out in the policy and principles for risk management and policy for sustainability management and defines a framework for the company's approach to sustainability within the investments area.

# 3 Roles and responsibilities

The Board of Directors is accountable for Protector's sustainability strategy. This includes policy for responsible investments.

The administration is responsible for an appropriate organizational structure in order to implement the principles set out in this policy.

Chief Investment Officer (CIO) is accountable for integrating sustainability factors into the investment strategy and promoting sustainable practices through the management of the investment assets.

## 4 Ownership principles

Protector shall not invest in companies that are responsible for or contribute to serious or systematic violations of human rights, that have a major negative impact on the environment or that are involved in corruption. To ensure that the company's investment universe contains companies that meet generally accepted ethical guidelines, Norges Bank's exclusion list is followed.

We focus on the following themes in our follow-up of sustainability:

- Zero emissions by 2050;
- Equality, diversity and inclusion;
- Good corporate governance.

## 5 Tools

Protector will utilize three tools in its role as a responsible investor and owner:

- Integration;
- Active ownership;
- Exclusion.

### 5.1 Integration

Protector shall seek to integrate sustainability factors into its investment analyses and decision-making processes. Assessment of sustainability factors shall include an assessment of relevant challenges and opportunities, including climate related risks.

### 5.2 Active ownership

Protector is often a major shareholder or lender. This gives opportunities to exercise our ownership. The exercise of ownership is based on an assessment of how Protector can have the greatest impact. In some cases, it may be better to retain an ownership position and exert influence rather than exiting the position.

Appropriate means of exercising ownership include:

- Ongoing contact with management and/or board through investor meetings;
- Promoting best practices from companies within the same industry;
- Reviewing and providing input on bond terms at issue, or in written resolutions;
- Voting and potentially submitting shareholder proposals at general meetings;
- Participation in corporate bodies, e.g. nomination committees.

Protector also seeks to collaborate with other investors to influence companies in matters related to corporate governance and sustainability.

### 5.3 Exclusion

Protector shall exclude from its investments any companies that are associated with gross and/or systematic violations of generally accepted standards of business conduct.

Protector shall monitor exclusions from the Government Pension Fund Global made in accordance with the current Guidelines for Observation and Exclusion from the Government Pension Fund Global, and generally follow these exclusions.

## 6 External management

Protector manages the majority of investments in-house. In the case external managers are used Protector shall:

- Assess the work of external managers on integrating sustainability risk and factors;
- Incorporate this policy into mandates and management agreements;
- Follow up on external managers' adherence to this policy.

## 7 Monitoring and reporting

Protector shall at a minimum update on its status relative to this policy annually, in connection to the publishing of the company's sustainability report. The carbon footprint and intensity of investments shall also be reported annually. The company shall carry out an annual assessment of exposure to climate risk in its investment portfolio according to requirements in Solvency II framework.

## 8 Follow-up and maintenance

The Board of Directors shall revise the policy as needed.

Version	Description	Reviewed by	Owner	Approved by BoD
1	1st version		DMN, CIO	07.09.2023