



Responsible investments

Report 1-2021



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The power of a declaration of contents

The world has a long list of challenges that can only be solved through a common set of rules, alignment and cooperation between countries. The problem is that, in international politics, common rules are few and far between. Within each country there is generally a complex structure of legislation organising human activity. Organisations like the OECD and UN have a rich set of rules and guidelines, but no possibility of commensurate sanctions.

In 2021, 70 years have passed since the signing of the Treaty of Paris. Since then, the building of a common Europe has evolved rapidly, with a steadily increasing number of member countries (exception noted) and deeper integration. Through this process, the EU has developed unique expertise in designing laws – regulations and directives – that apply to many countries of an arguably widely different nature. And the economic weight of the region dictates that actors in other countries must also comply with these rules.

To be a bit more specific: In many fields, the EU has developed as an international legislator. This applies not least to the financial industry, where e.g. the MiFID II (Markets in Financial Instruments Directive) also influences financial institutions in North America. Europe is too big to let one's company be cut off from doing business here.

This makes it all the more interesting to see what will come out of the growing ambitions of using the financial industry as a means of promoting sustainability. And here, considering the complexity, things have developed at an impressive speed. In 2018, the European Commission released an action plan for financing sustainable growth. In 2020, the Taxonomy Regulation entered into force, providing standard definitions to companies, investors and policymakers on which economic activities can be considered environmentally sustainable. This regulation ensures that everyone in the business speaks the same language, or more specifically that clear requirements apply to claims of sustainability.

This year the EU Sustainable Finance Disclosure Regulation (SFDR) came into force. This regulation concerns the disclosure of information on sustainability in financial products. The goal is to direct capital flows towards more sustainable investments with lower climate emissions. The regulation has already entered into force in the EU and it is on its way into Norwegian legislation through a draft that has been subject to consultation. In any case, all Norwegian actors must already align themselves.

The new rules intend to make financial products more transparent, to provide a clearer declaration of contents. Investors should be able to see how climate change and other environmental challenges affect the financial risk, while relatively detailed rules will make greenwashing difficult.

Of the greatest practical significance is perhaps the division into different types of funds or financial products:

- Article 9 funds. Let's call them dark green. These are funds whose very purpose is sustainable investments.
- Article 8 funds can then be described as light green. They must promote environmental or social characteristics, but do not necessarily have this as a stated purpose.
- Article 6 funds do not take such considerations into account. This must then be made clear, a bit like a financial version of the warnings on cigarette packs.

Presently we have one fund that is classified under article 9: Pareto ESG Global Corporate Bond, which also holds the Nordic Swan Ecolabel and has its own dedicated ESG analyst. With one exception the remainder of our funds are now article 8 funds and we sharpen our ESG focus in all of them – irrespective of their classification. You will find more information on this in the relevant fund documents in due course.

Kind regards
Finn Øystein Bergh
Chief Economist & Strategist



Guidelines for responsible investments

1. BACKGROUND AND PURPOSE

Pareto Asset Management AS ("Pareto Asset Management") aims at contributing to sustainable development of markets and long-term value creation by investing in a responsible and ethical manner. We believe that responsible investments are important for achieving the best possible risk-adjusted return for our unitholders and customers. Sustainability and sound corporate governance give companies competitive advantages and contribute to long-term value creation.

This document sets out guidelines for responsible investments undertaken by Pareto Asset Management on behalf of our unitholders and individual asset owners. The purpose of the policy is to prevent Pareto Asset Management from contributing to the violation of human rights, labor rights, corruption, environmental damage or other unethical actions. Furthermore, we consider it important to integrate sustainability assessments into our investment processes, as this can also affect the long-term value of our investment.

We expect the companies that we invest in to comply with the same principles.

As part of our efforts to promote responsible investments, Pareto Asset Management has signed the UN Principles for Responsible Investment ("UN PRI")¹. These guidelines are based on UN PRI, the UN Global Compact², the guidelines for the Norwegian Government Pension Fund Global, the Principles for the exercise of ownership rights in investment companies from the Norwegian Fund and Asset Management Association, as well as internationally recognised principles and conventions.

2. RESPONSIBLE INVESTMENTS

2.1 Priorities

We seek to invest in companies that have good quality of operations and management. The companies should have a clear focus on ethical issues in their attitudes and actions, as well as having a value base for the business that complies with the guidelines. The companies must exert good corporate governance, comply with national legislation as well as international conventions, and show an open and complementary information policy. This means we emphasise social conditions, the environment, sustainability and good corporate governance when considering a company.

Ethical risk assessments must be conducted before an investment can be made.

2.2 Exclusion of companies

Pareto Asset Management shall not be invested, on behalf of our funds and customers, in companies which themselves or through entities they control:

- Produce weapons that, in normal use, violate basic humanitarian principles
- Produce tobacco
- Sell weapons or military equipment to states subject to sanctions from the UN Security Council or other international measures directed at a particular country that Norway has supported (mandate for the management of the SPU section 3-1 second paragraph letter c)
- Mining companies and power producers that themselves or consolidated with controlled entities receive 30 per cent or more of their revenues from thermal coal, or base 30 per cent or more of their operations on thermal coal activity
- Produce pornography

¹ The contents of UNPRI can be found here: www.unpri.org/pri/an-introduction-to-responsible-investment.

² The UN Global Compact contains ten general principles derived from the Universal Declaration of Human Rights, the ILO Declaration of Fundamental Principles and Rights in Work and the Rio Declaration on Environment and Development.

Pareto Asset Management may decide to exclude a company if there is an unacceptable risk that the company contributes or is responsible for:

- Human rights violations, such as killing, torture, deprivation of liberty, forced labour and exploitation of children, including child labour³
- Violations of individuals' rights in war or conflict situations
- Breach of basic employee rights
- Severe environmental damage
- Actions or omissions that lead to greenhouse gas emissions at an aggregated company level
- Corruption
- Other repeated or significant violations of basic ethical norms

Pareto Asset Management shall exercise a precautionary principle in connection with investments in biotechnology companies, gambling and alcohol.

2.3 Exclusion decision

Companies listed on the exclusion list of the Norwegian Government Pension Fund Global after the decision of Norges Bank's Executive Board shall be automatically excluded from the investment universe of Pareto Asset Management.

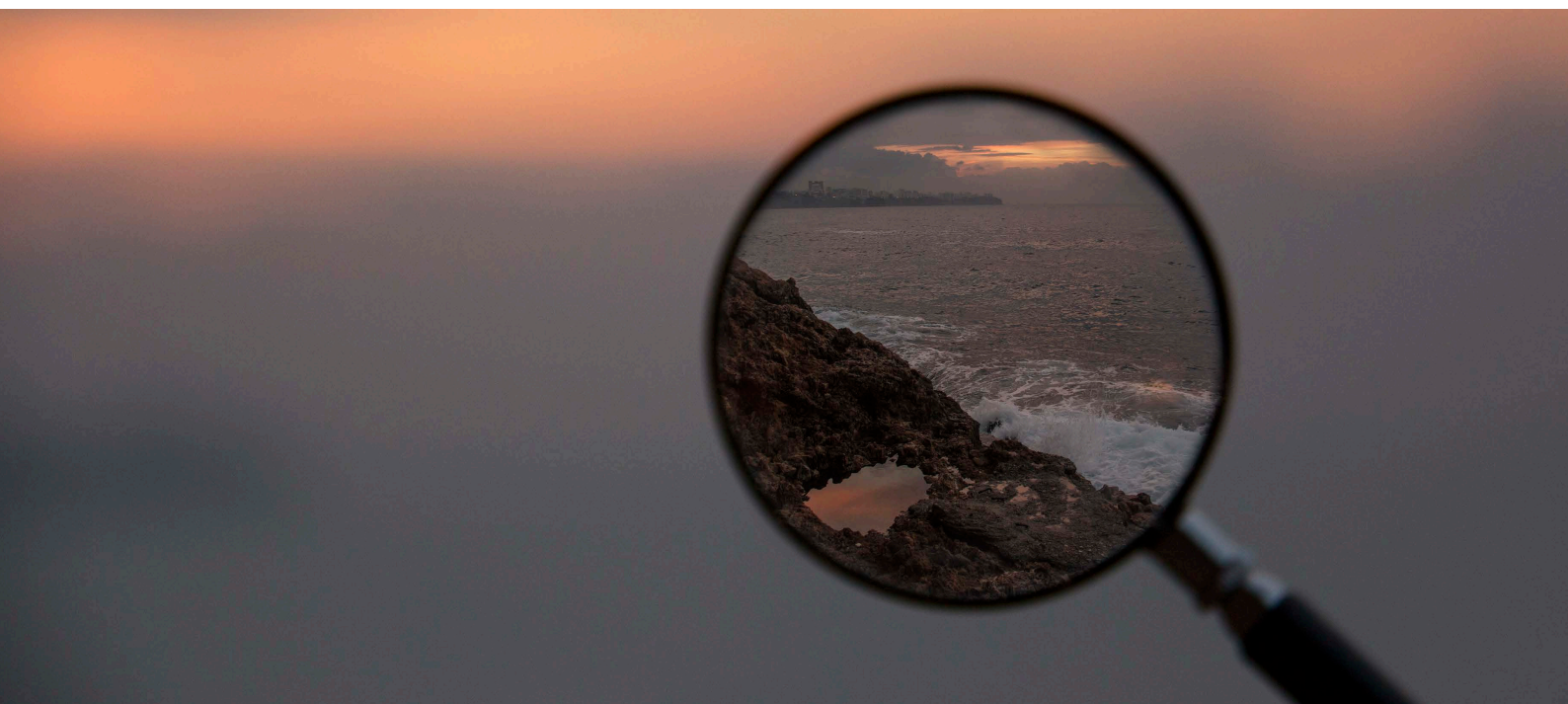
If legitimate doubt arises as to whether an investment is in line with the guidelines, a separate ethical risk assessment shall be conducted. This assessment can be based on input from our customers and other stakeholders, as well as various publicly available sources. Pareto Asset Management will nevertheless always draw its own conclusions based on a specific assessment of objective, verifiable facts.

3. CORPORATE GOVERNANCE

Pareto Asset Management shall exercise active ownership in the portfolio companies in order to promote responsible business operations. This means that we will use our ownership rights and influence in the companies to help move the companies in a positive direction in terms of social relations, environmental issues, sustainability and good corporate governance.

When there is a specific reason to believe that a company violates our policy of responsible investments, we will consider addressing the issue with the company's management and encouraging the company to correct the circumstances. If necessary change is not implemented, Pareto Asset Management will normally sell all positions in the company.

³ This includes "the worst forms of child labour" as defined in the ILO Convention (No. 182) Article 3.



4. RESPONSIBILITY FOR MONITORING AND CHECKING THE GUIDELINES

Pareto Asset Management has established an ethics committee entrusted with the responsibility to ensure that the company's guidelines for responsible investments are up to date and appropriate, as well as assess and decide exclusion of companies in accordance with paragraph 2.3 of the guidelines. It will also assist portfolio managers with training, advice and sparring as needed. In particularly demanding cases, the Ethics Committee shall inform the CEO.

The Ethics Committee is headed by the company's Chief Economist & Strategist and consists, in addition, of representatives of different departments as required.

Twice a year, the Ethics Committee prepares a report on our guidelines for responsible investments and the practice of these. The report reviews specific topics we have worked with as well as relevant company assessments and dilemmas. It shall be available to our customers.

The chairman of the Ethics Committee shall annually provide the Board of Pareto Asset Management with an overview of the status of ongoing work for responsible investments in the company.

The Compliance Manager shall supervise compliance with our Guidelines for Responsible Investments, including the necessary exclusion of companies. In addition, the compliance officer will attend meetings of the Ethics Committee as an observer.

Background and facts

Behind the UNPRI principles is the UN Environment Program Finance Initiative (UNEP FI). UNEP FI is a global partnership between the United Nations Environment Program and the financial sector. Among the goals for the collaboration is to identify, promote and realize best environmental and sustainability practices in the financial industry. Central to this collaboration are ESG questions, derived from the English concepts environmental issues, social issues and corporate governance.

Through our signature, we committed ourselves to respond to ESG questions that may follow, to the best of both our customers in the long run and for society as a whole:

1. We will implement ESG issues in our investment analysis and decision-making processes
2. We will practice active ownership and implement ESG in our ownership policy and its exercise
3. We will work for satisfactory reporting on ESG topics from our portfolio companies
4. We will promote acceptance and implementation of the principles in the financial industry
5. We will work with other signatories to strengthen the effect of the principles and their implementation
6. We will report on our activities and our progress in implementing the principles

Our signature also includes a more general, implicit obligation to follow principles and standards anchored in the UN. These are voluntary, non-judicial recommendations that express expectations of good corporate governance, and which provide expectations for good corporate practices in dealing with environmental and social issues. In assessing our investments, these principles and standards will act as a reference framework and guide.

The UN Global Compact contains ten general principles derived from the Universal Declaration of Human Rights, the ILO Declaration of Fundamental Principles and Rights in Work and the Rio Declaration on Environment and Development. The principles are general and state, among other things, that companies must respect human rights and not be involved in violations of them, maintain freedom of association and collective bargaining rights, and eliminate all forms of forced labor, child labor and discrimination in working life.

Product based exclusion criteria

Weapons and ammunition

A variety of types of weapons, ammunition and warfare methods are prohibited under international law, such as the Geneva Convention.

Both **Saab** and **Kongsberg Gruppen** are currently excluded from the company's investment universe as a precautionary principle. In our previous report's section on company assessments, we also showed how we worked to clarify whether the American company **Heico** is involved in weapons production. The company was and still is excluded from our investment universe.

Tobacco

Tobacco is a legal stimulant, which according to WHO is causing several million deaths in the world each year.

Coal

Pareto Asset Management follows the Norwegian Government Pension Fund in its assessment of coal producing companies.

Pornography

Pareto Asset Management does not invest in companies producing pornography.



Product based precautionary principles

Biotechnology

Modern biotechnology touches life's big questions and has an impact on what we think about human worth. It is therefore relevant to the whole global population, and not just doctors and researchers who carry out in vitro fertilisation, map genes and research stem cells. Investments in biotechnology may involve a risk of violation of fundamental ethical norms.

Alcohol

We have considered whether there should also be an absolute ban on investments in alcohol but has concluded that it is neither desirable nor manageable in an ethically consistent and sound manner.

Alcohol as a food additive is generally considered to have many positive aspects. Furthermore, alcoholic beverages are embedded in most societies, with many businesses indirectly profiting from alcohol consumption. Breweries, wineries and distilleries stand out as obvious examples, but also wholesalers, hotels, restaurants, airlines, shipping companies, railways and especially grocery chains may have a significant portion of their profits from the sale or delivery of alcohol. The same applies, of course, to real estate companies with revenue-based rent, such as the listed company Olav Thon Eiendomsselskap (OSE).

An absolute ban on investments in companies with interests in alcohol will therefore likely be perceived as a case of double standards, and insurmountably complicated. In consideration of the significant social and health problems relating to alcohol abuse, the company will nevertheless apply a precautionary principle with investments in alcohol.

Gambling

We have considered whether there should be a ban on investments in gambling. At this point, our assessment is that a general ban is problematic for several reasons.

Gambling has a relatively wide definition, covering everything from games that primarily fills an entertainment function, to more economically active activities where the outcome is largely due to chance and luck.

For the purpose of these guidelines, it's the possible harmful effects that are of importance. The consequences of gambling can be summarised in two words: gambling addiction.

Pareto Asset Management does not want to act in a way that contributes to increasing and more harmful gambling addiction. As part of the investment process we must therefore always raise the question of whether the company in question has a way of business that it is likely to create gambling addiction.

In our opinion, a general ban will not contribute to better achievement. An important element is that a significant part of the gambling business largely, or wholly, fills an entertainment function. Although the gains are in the form of money, unlike the teddy bear in the amusement park, the stakes are normally such that participation is for fun, excitement and surprise, not because it nourishes some presumption of getting rich.

Furthermore, gambling, like alcohol, has such an extent that it can be difficult to draw sharp limits. One might imagine a kiosk chain with deployed slot machines of a type approved by the relevant authority, where the kiosks get a lease while the profits are due to a third party. The chain then has no benefit of increased gaming on the vending machines, and their own activity can be claimed to be limited to the letting of floor space.

Similarly, gambling is offered on most cruise ships and passenger ferries, as well as at some hotels. In addition, there are companies producing the game machines used without this being considered gambling. For these reasons, we have concluded that there should be no general ban on gambling. On the other hand, it seems obvious that it should apply a precautionary principle when investing in companies that offer gambling.

Conduct etc.

Human rights violations

Gross or systematic violations of human rights such as killing, torture, deprivation of liberty, forced labour, the worst forms of child labour. In our reviews, we have not found any circumstances that indicate that any of our portfolio companies contribute to such human rights violations.

Serious environmental damage

Serious environmental damages can be said to include severe climate impact in the form of relatively high greenhouse gas emissions, which is also in line with Norway's international commitments and the government's climate report.

Based on this review, we are not aware of circumstances that indicate that any of our portfolio companies contribute to serious environmental damage. However, we have previously spent a lot of time assessing the situation for **Norsk Hydro's** operations in Brazil, where heavy rain in February 2018 led to flooding and environmental damage. The company is no longer on our watch list.

Greenhouse gas emissions

Actions or omissions that unacceptably lead to greenhouse gas emissions at an aggregated company level. Many will argue that the oil industry contributes to unacceptable emissions of greenhouse gases. Therefore, we have looked into our investments in this sector.

In November 2016, the Carbon Disclosure Project (CDP) analysed the climate strategy of the world's largest oil and gas companies entitled "Which oil and gas companies are preparing for the future?"

Statoil (now Equinor) was top rated, followed by Eni and Total, while Exxon was in tenth place.

Pareto Aksje Norge holds stock in **Equinor**.

In November 2018, the report "Beyond the cycle" was issued, where the CDP analysed how oil companies were positioned towards the transition to a low carbon economy. Equinor was ranked on top of a total of 24 major oil companies. ExxonMobil, which is now out of our portfolios, was ranked as number 17.

See also the section on climate risk.

Gross corruption

In August 2017, Samsung heir and Group Vice Chairman Lee Jae-yong (50) was sentenced to five years in prison for corruption.

Jae-yong was found guilty of enabling bribes to organisations where he expected reciprocal support from former President Park.

We assume that this case will contribute to a changed pattern of action, both in the company and among shareholders. South Korea has a special business structure that from time to time has led to challenging corporate governance issues. The local markets are adapting to such global regulatory demands, and we look at the disclosures and verdict in this case as a step in the right direction.

Pareto Total holds shares in **Samsung**.

Other particularly gross violations of basic norms

We have not identified other gross violations of basic norms.

Corporate governance

Engagement policy

Pareto Asset Management conducts meetings with the management and board members in many of the portfolio companies, as well as shareholders, on a regular basis. This dialogue is the most important instrument we use in our work as an active owner.

Grounds for initiating engagement activities may be breach of ESG criteria, substantial investment in the company or a need for more information on critical ESG damage that has already occurred.

Requests from clients can also be grounds for engagement.

Proxy voting

Pareto Asset Management has established its own voting guidelines. These are based on the Norwegian Code of Practice for Corporate Governance.



Active ownership

Stating the obvious, our portfolio companies are not perfect. If we decide to invest in a company, there is most often a lot we wouldn't mind being able to change. That leaves us two options.

There is a phrase called "voting with your feet", which means leaving something or someone you disagree with, rather than trying to change them. In our industry, we might also say that we vote with our wallets. We do this when we sell something we do not want to own – or, conversely, seek particularly promising investments.

But we do more than that. We also try to influence the companies we own. We vote at annual general assemblies, we have direct dialogue with management or try to work with other committed shareholders. And we do believe that, sometimes, we can push the development in the desired direction.

Our Norwegian equity portfolios consist of companies we know well, in many cases after years of ownership and a number of opportunities for dialogue with management. In the fund Pareto Aksje Norge, which has a relatively low turnover rate, we have engaged in dialogue with practically all the companies in the portfolio on corporate governance, environment and (to a lesser extent) social conditions over the past few years. These are companies we know well, with direct lines to top management.

We also have discretionary management of Norwegian equities. These mandates all hold the same companies as Pareto Aksje Norge, which simplifies engagement. The combined portfolio is our largest in the equities space, representing the major part of our Norwegian stock investments. Here, our portfolio managers have voted at all general assemblies being held up to now. This has been made a standard procedure. We have arranged it so that votes are being registered through Euronext VPS, which is the only central security depository in Norway, if the listed companies are using this institution. In addition, there has been dialogue with different banks about corporate governance, green loans and ESG scoring loans. In our opinion, the banks have made great progress in this area, with more differentiated prices on loans based on sustainability targets.

We have, in particular, had a discussion with management at **Sparebanken Vest** about a change in their articles of association concerning representation at the general assembly, a point which we will pursue further. We have discussed anti-money laundering systems with DNB and held a dialogue with two other banks about management changes. In our engagement with **Yara**, we have had discussions about human rights violations in Belarus, where one of the world's largest suppliers of potash (potassium carbonate) is also a supplier to Yara. We have discussed a number of issues with **Norsk Hydro**, including the allocation of capital to new initiatives like hydrogen, sun and batteries. And we've had conversations about corporate governance, antitrust and more with **With. Wilhelmsen Holding** and **Wallenius Wilhelmsen**. Both **TGS** and **Subsea 7** have carried out significant downsizing and we have inquired about safeguarding of their employees' rights. We have also discussed strategic assessments behind the reorganisation of the articles of association in both companies now that they will be energy service companies.

The nomination committee has been a discussion partner in several companies. And, with **Bonheur**, we have continued a previous discussion about its contract structure and payments to other companies in Fred. The Olsen system.

It is our assessment that these and other dialogues not only provide input to the companies and a notification about what we managers emphasise; they also provide us with important information about key risk factors in the companies in which we have part ownership.

For companies in other countries, there are usually somewhat more comprehensive procedures required to cast a vote. We are in the process of putting in place the necessary authorisations and digital notification routines, so that this can be better streamlined and become less resource-intensive. That, we believe, is in the interest of our unitholders. In any case, we intend to return to this in a subsequent report, as, in addition, more general meetings will have been held.

Of course, many of our foreign positions are in significantly larger companies with a somewhat longer distance to top management. It's not likely to be easy to get in personal contact with the management of Microsoft or Alphabet, which owns Google. But we have the same digital presence as all other investors, our input is recorded at one level or another, and we get the same information as everyone else.

Climate risk in our portfolios

In our analysis, we strive to find companies with a favourable relationship between potential upside and downside. Finding companies with a good margin of safety is an important part of risk management. For an active manager, therefore, climate risk is included as a natural part of our company analyses.

Climate risk can be categorised as follows:

- Physical risk: Physical damage caused by climate change
- Transition risk: Financial risk from regulations, technology, consumer behaviour and political actions when transitioning to a sustainable society
- Liability risk: Claims for damages due to actions that can be linked to climate policy and climate change

In such a framework, it is especially the *transitional risk* that will create tomorrow's winners and losers in the stock market. If we find that a company has significant *physical* or *liability risk*, it is typically a company we stay away from anyway. For banks and insurance companies, we nevertheless consider the possible effect on loan provisions and claims payments.

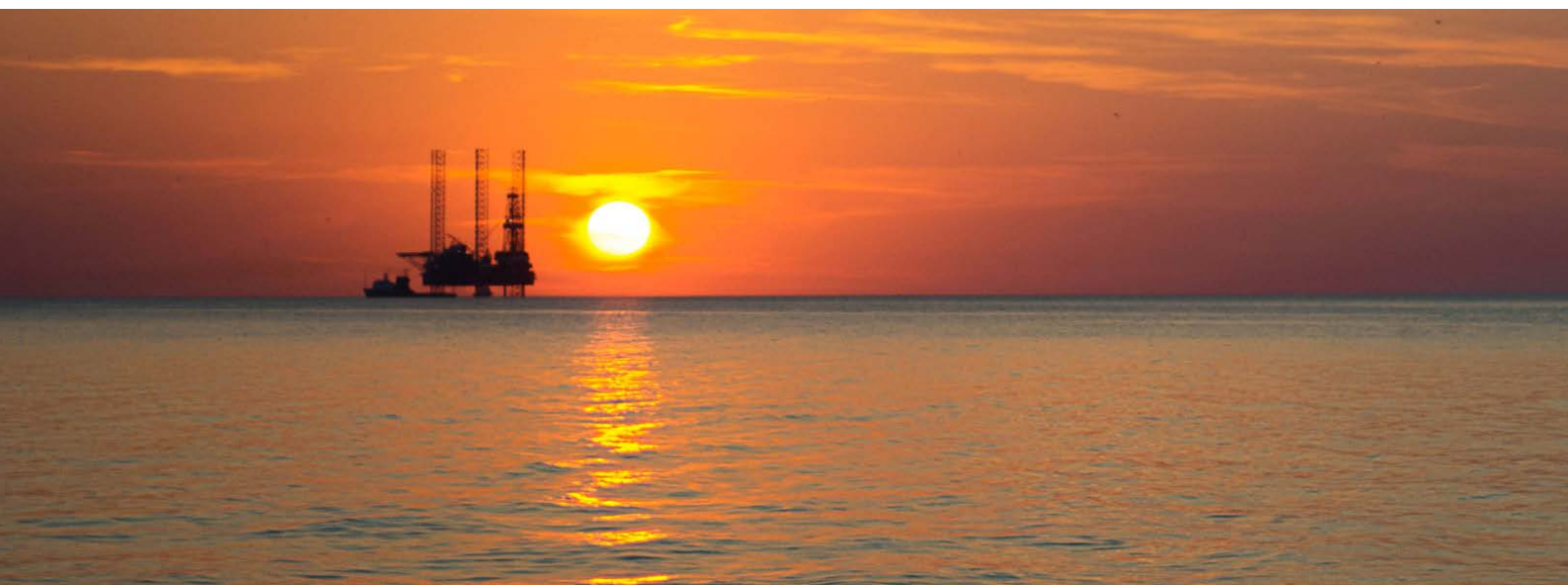
The concept of climate risk naturally leads to evaluating fossil energy, especially in Norway. Concepts such as *peak oil* and the need to reduce greenhouse gases make the transition risk well visible to oil and oil service companies.

Two of our funds, Pareto Nordic Cross Credit and Pareto Global, exclude fossil energy producers. This is basically well justified financially, as Norwegian investors are directly or indirectly highly exposed to the oil industry. Global funds without the same exposure thus provide a better risk balance overall.

The same absence of fossil energy can also be found in the fund Pareto ESG Global Corporate Bond. There it has a further function, since the fund has attained the Nordic Swan Ecolabelling – as the first fixed income fund in Norway and Sweden. This fund also has a dedicated ESG analyst working on sustainability issues. For the time being, this is our only article 9 fund.

However, Pareto Asset Management has no principled objection to fossil energy. Oil and gas are central, integrated elements in all modern societies, and in many cases, they can replace significantly more polluting coal. At the same time, the work to limit climate change is one of humanity's biggest challenges, and CO2 emissions from fossil fuels contribute significantly to such emissions. Thus, it is clear that the industry has a considerable social responsibility. We must consider whether we believe the companies we invest in take this responsibility seriously.

The oil sector, which is dominant in the Norwegian economy, is well represented in other of our funds, both in equities and in fixed income. In particular, we do believe that oil and gas are good substitutes for coal in the slightly



shorter term, and we also see that Norwegian companies are often among the best at reducing emissions from the extraction itself. In this way, this sector is definitely part of the solution and not just part of the problem.

Note that climate risk is about much more than the ethical perspective. For example, companies with low greenhouse gas emissions will have a significant competitive advantage in the face of new regulation and changed consumer behaviour. It is likely that they will also have an edge in attracting investors, which may affect the future price trend in our favour.

An industry with an obvious climate risk is aviation. We have previously owned shares in both Norwegian Air Shuttle and Ryanair, and we have not imposed any ban on such investments. But the concept of *flight shame* is a reminder that there is a significant transition risk associated with such investments (in addition, of course, to the fact that the emissions themselves are a negative element). It is also not unlikely that airlines will face higher environmental taxes, which we must take into account in our analyses.

Relevant factors when investing in airlines include the age of the aircraft fleet and the load factor, which together are decisive for CO₂ emissions. We then aim to uncover the *relative* climate risk, to find out which companies will do best.

In practice, it is demanding, not to mention difficult, to assess climate risk in our portfolio companies. Reporting on climate risk and other sustainability issues is little regulated, and the quality varies considerably. Many companies lack a systematic approach to reporting on sustainability, which the Governance Group has concluded in its analyses of the 100 largest companies on Oslo Børs (the Oslo stock exchange). However, they have also found that many companies have improved their reporting on sustainability.

Hence, we believe that by exercising active ownership and dialogue with the companies, we can help sharpen the focus on sustainability. Either way, we note that many companies are stepping up their sustainability efforts and thereby also work towards reducing climate risk. From the Pareto Global portfolio, we can cite the following examples:

BASF

BASF is the world's largest chemical company, emitting 22 million tonnes of CO₂ a year. But BASF itself has high ambitions for CO₂ cuts and the company will be an important part of the EU's green deal. It cut CO₂ emissions by more than 45 per cent from 1990 to 2018, through optimisation of energy production and integration of chemical processes. The next goal is to cut emissions by 25 per cent by 2030, just as the company fires up a new production plant in China. To manage this, it must invest in new environmentally friendly technology.

BASF is building the world's first electrified steam cracker that can produce basic chemicals without CO₂ emissions. Another current technology is methane pyrolysis, which is used to produce hydrogen from natural gas without CO₂ emissions. This technology has only 1/5 of the power consumption of conventional electrolysis. A pilot reactor is already in operation. The company's long-term ambition is to be CO₂ neutral by 2050. Going forward, BASF will stamp all its products with the CO₂ footprint.

Microsoft

Invests heavily in reducing emissions and contributing to a sustainable future. Has been carbon neutral in its global operations since 2012, but only through paying others for cuts. Will be carbon negative by 2030 and will have compensated for all historical emissions by 2050.

Prudential

A life insurance company where managing climate risk and opportunities is a strategic priority; management's remuneration is linked to achieving this. The company has a goal of cutting the portfolio's emissions by 25 per cent by 2025 and being a carbon-neutral asset manager by 2050.

We keep seeing that companies with real for sustainability efforts are being rewarded for this in the stock market, either because they increase earnings or because stock market pricing is higher. In this sense, we have yet another reminder that with active portfolio management, there is no contradiction between profitable and responsible investments – on the contrary.

Company assessments

Rockwool – cloudy on coal

The Danish company Rockwool has not been mentioned here before. It is probably best known for rock wool for insulating houses, but also produces, among other things, facade panels and roof panel systems intended to reduce noise and fire hazards. Most are products that provide a factual basis for the company's unrelenting emphasis on sustainability and the circular economy. For example, rock wool makes a good contribution to reducing energy needs in homes and offices.

The problem is that the production of these products consumes a lot of energy. And Rockwool bases part of its production on coal. How much?

Well, that's information that the company will not divulge. – Due to the competitive nature of our industry we do not disclose this information, the company replies. For Pareto Asset Management, this is a problem, as our policy does not allow companies that base 30 per cent or more of their business on thermal coal.

We have not taken the step of excluding the share, letting three arguments decide. Firstly, management is very clear that they are going to reduce the use of coal. There are concrete, credible plans. This year, two plants in Denmark and Poland, respectively, will be converted to natural gas / biogas, and a new plant in the USA will start up with natural gas. In Moss, the newly opened, rebuilt factory – which is based on electricity – will reduce emissions by 80 per cent.

Secondly, the share is not on the exclusion list of the Norwegian Government Pension Fund Global. The Petroleum Fund, as it is informally called, has the same restriction on coal use, which indicates that the share is within the limit (or that the Council on Ethics in Norges Bank has also granted the company the benefit of the doubt).

And third, the products are obviously sustainable. This is not just about focusing inquisitorially on the problems. Sustainability is about opportunities, and here they are good. Rockwool itself believes that the products they sold in 2020 will save 100 times the energy consumed during their lifetime. We therefore think that Rockwool is a good company to own, which we do in the funds Pareto Nordic Equity, Pareto Nordic Alpha and Pareto Nordic Omega.

We will still work to gain more insight into the company's energy use. This is also about the value that we place on transparency in the companies we own. At Rockwool it is a little too opaque.

**This is not just about
focusing inquisitorially on the problems.
Sustainability is about opportunities.**

Danske Bank – the cleanup that was not over

Pareto Nordic Return invested in Danske Bank in August and early September 2018, and the stock is also in the portfolio of the subsequently established Pareto Nordic Equity. Danske Bank had a relatively weak development since the stock peaked in May 2017, and it appeared to be much cheaper than the other major Nordic banks. Pareto Nordic Corporate Bond also had bonds in the bank, while Pareto Global Corporate Bond had just sold for commercial reasons.

At the time of this last purchase, Danske Bank was conducting an internal audit of its Estonian branch. Already in May, the Danish FSA had announced that it would impose fines on the bank as a penalty for the money laundering that had been going on for several years in Estonia.

However, the culpable department was shut down in 2015. We thus figured that we invested in a bank fully engaged in cleanup and self-questioning.

The bank submitted its internal review in September 2018, revealing much more comprehensive money laundering than we had assumed. Worse yet, the report exposed a pervasive culture of unacceptable attitudes in the bank, in the sense that top management and the Board should have acted several years ago. For a long time, the bank trusted the reporting from the Estonian branch and the group's overall money laundering routines. The reporting later turned out to have been deficient and misleading, and group routines failed.

The first internal whistleblowing came late in 2013. It put the case on the agenda for both group management and the Board. Measures taken in 2014 proved to be insufficient. Towards the end of 2014, there came a highly critical report from the Estonian supervisory authority, and the business was finally shut down in 2015.

The report and subsequent events indicate that the bank will receive fines from the Danish and possibly US authorities. Its former CEO, Norwegian Thomas Borgen, was for a time charged by the Danish Prosecution Service. The case was dropped in early 2021. After Borgen, the bank has had two managers – both recruited from leading positions in European banking (respectively Danske Bank and ABN Amro) – and both eventually had to resign after allegations of breaches of ethical guidelines on their watch in previous positions.

One may all but ask whether there are experienced bank managers in Europe today who cannot be questioned in one way or another – due to the large and complex organisations, the extensive regulations along with the more or less constant presence of branches, employees and / or customers trying to find holes in the fences for their own gain.

In 2019, the bank hired many people in compliance and IT services to prevent money laundering. A lot has been invested in IT systems related to this. All of the bank's employees have undergone training to both prevent money laundering and correct errors in a proper manner. In addition, the Board has appointed a separate sub-committee for Conduct & Compliance.

There is no doubt that Danske Bank has been a bad stock investment. This way it is a regrettably striking illustration of the risk inherent in ESG issues.

In the present situation, our assessment is that it is appropriate to keep the Danske Bank securities. The bank itself has put all its cards on the table – although we have been inclined to draw the same conclusion earlier – and prematurely. The Danish Financial Supervisory Authority, which on a more general basis has praised the bank, criticised eleven members of management in its report. All of these eleven have now left the bank. Much indicates that we have now passed the ethical nadir, but the road back has been both longer and heavier than we expected. So far, the unresolved situation with the US authorities hangs like a dark cloud in the sky. When the clarification comes, we believe it will be a redemptive event for both the bank and the stock. Either way there is no doubt that, going forward, the bank will and wants to focus on ethics and law and order in its business conduct.

Swedbank – shorting a scandal

In earlier reports, we have highlighted the lack of sufficient routines to uncover possible money laundering in Swedbank. The bank is still being investigated in both Sweden, Estonia and the US.

Pareto Nordic Omega has held on to its short position in Swedbank. We do not object to shorting companies with a lousy ESG record, which we know is a point of discussion in the investment community. This short position was initiated before the scandal became public, so it has been a profitable position for the fund.

Wells Fargo – remains of a culture problem?

In 2016, it was revealed that bank accounts in Wells Fargo were created without the approval of the clients. The audit firm PwC was engaged by Wells Fargo to uncover the scope. Their review documented that this involved up to 3.5 million deposit accounts and 565,000 credit card accounts.

In comparison, the bank had 82.8 million accounts with deposits of less than \$ 250,000 (estimates of the number of accounts for retail customers and small businesses) and 8.5 million active credit card accounts. It was further revealed that this had been going on from 2011 to the end of 2015.

The review pointed all the way to the top: Management's sales goals were so aggressive that some customer service representatives saw no other way of meeting their goals than going beyond their instructions.

The unauthorised accounts did not contribute to enhancing the bank's profitability or earnings and most likely was rather a net expense due to incorrect bonuses. Wells Fargo has paid \$185 million in settlements with public oversight bodies and reimbursed fees of \$2.6 million to customers associated with these accounts. The settlement in the class action suit was set at \$480 million. In comparison, net profits in 2017 were \$22 billion.

Retail sales goals were cancelled. In the future, customers will receive a confirmation email when bank accounts are created. All customers with deposits at the bank have been contacted to make sure the account structure is according to their desires.

Management should have known that the aggressive sales targets could create an undesirable culture and should have changed incentive schemes. After the breaches were uncovered, management should have taken steps to demonstrate accountability through organisational changes and reclaim bonuses. This realisation led to the CEO being asked to leave the company. A total of 5,300 employees were terminated as a result of the scandal, of whom 10 per cent were considered managers.

In the wake of this scandal, new cases appeared of lesser scope. In 2017 it was revealed that 570,000 customers had paid for car insurance they did not need. Other issues have been related to credit card fees, seizure of mortgaged cars, sale of complicated savings products and excessive fees in asset management.

Following these revelations, new regulatory restrictions were imposed, limiting the size of Wells Fargo's balance to the level reported at the end of 2017. The injunction will be lifted when new control and risk systems are implemented and considered to be satisfactory by the U.S. Federal Reserve.

Traditionally, Wells Fargo has been considered a rather staid bank with high ethical standards. The bank has a long and good history with a solid balance sheet and low loan losses. We do believe that it is fully possible for Wells Fargo to win back the trust of both customers and investors.

And we have doubted our way to the conclusion that they deserve our trust as well, even though we have repeatedly had to realise that the cleanup was not completed after all.

Pareto Total holds shares in Wells Fargo.

Betsson – apt to create gambling addiction?

As stated on page 8, we have not chosen to enact a general ban on investment in gambling. However, we have declared that a precautionary principle must be applied when assessing such investments. Central to this assessment is the risk of gambling addiction.

Pareto Nordic Return has invested in the Swedish gaming company Betsson. The company offers online casino, poker and other games with money bets. It is obvious that we must assess the risk of gambling addiction.

The company holds public licenses in regulated markets, which of course implies an incentive to operate in such a way that the licenses can be regarded as commercially safe in the long term. Betsson's most important markets are Sweden and the Netherlands, where there are clear rules for obtaining a license. We also note that the advocacy group Spillavhengighet Norge has opened up to the idea of licensing foreign gambling companies as an alternative to the Norwegian gambling monopoly. The idea is that the market is better regulated through a license-based regulatory framework.

This, however, is not sufficient. We need to investigate how Betsson manages this responsibility – and how it turns out. And, not least, whether investor leverage can influence the company's prioritisation of this area.

As of the quarterly report for the last quarter of 2017, Betsson has reported key figures for responsible gaming. The company expresses that providing gaming in a controlled and responsible manner is the key to satisfied, safe and loyal customers. We might add that it is also the key to keeping both government and investors satisfied and loyal.

The company has established its own department for responsible gaming. This department works closely with functions such as customer service and payments. In addition, they have developed software to monitor customer gaming activity and identify players who may have gambling addiction issues. Custom tools have been developed that customers can use to control their own gambling, and all employees are coached annually in order to recognise signs of gambling addiction. In 2017, the company also had an external review of procedures and tools for addiction management. It cooperates with the Global Gambling Guidance Group (G4) and Sustainable Interaction.

During the lockdown, there was a significant increase in the company's responsible gaming activities. Due to great interest from the gamers sitting at home, it was necessary to monitor and intervene to a greater extent than usual. The company thus showed that they are serious when it comes to responsible gaming.

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Such measures show the increasing commercial necessity of limiting the risk of gambling addiction; they also reveal that the problem is not eliminated. Betsson reports that roughly one per cent of customer service inquiries are about game addiction in one way or another. With a large number of contacts, this means that there are many conversations about the subject. It also means that the company monitors and works to manage this problem. These conversations are referred to a team of specialists who are claimed to have extensive training in the field.

The company has a reputation problem. In an ESG ranking of 326 Swedish companies, the company comes out worst (alongside one competitor) in terms of reputation. The industry has a major challenge when it comes to communicating what it does to reduce gambling addiction issues. The company does not allow playing on credit, people under the age of 18 are not allowed to play, gambling addicts are closed out, efforts are being made to find out if customers are addicted, and so on. This has not left much of a mark in people's perception of Betsson and the industry.

In 2019, there was a law change in Sweden that limited the scope of gambling bonuses to customers. The company has received a minor fine for not complying with the new rules. However, like their competitors, they have appealed to a higher authority.

An investment in Betsson shares is not unproblematic and we have had discussions about the issue. Our preliminary conclusion is that we do not eliminate the company from our investment universe, where the company's obvious self-interest in limiting the problem – for both licensing and marketing and investor interest purposes – has been a weighty argument.

However, we will monitor how things develop and what is being done in the company.

A related point worth mentioning is that, today, there is a significant industry in PC and mobile gaming. These are not defined as gambling, but have similar addictive elements associated with payments from customers. Yet they are not facing the same scrutiny as money game companies. Maybe it's because they are not entering a market that has historically been associated with government monopolies. Large parts of this industry thus also do not offer the same self-help measures as the money game agents. The World Health Organization has, however, adopted computer games addiction as an official diagnosis effective from 2022.



Previous mentions

Attendo

We have discussed Attendo in previous reports. The company describes itself as one of the leading private care providers in the Nordic region, caring for the elderly, the disabled and children/families. Attendo operates in Sweden, Finland, Denmark and Norway.

In Sweden, the company received negative media coverage of the conditions at some nursing homes, and in Finland a public inspection was initiated, following a revelation of reprehensible conditions at the main competitor.

No such conditions were revealed in Attendo and after quite some time as shareholders we feel assured that the company has the necessary integrity and quality of services. We have therefore removed the company from this list.

Pareto Global, Pareto Nordic Equity, Pareto Nordic Alpha and Pareto Nordic Omega own shares in Attendo.

Playtech

Another company having been featured here is Playtech. The company sells software to Internet-based gaming portals, both the actual games and an integrated technology platform that includes customer accounts, risk management and IT operations. Playtech is thus a software company, but their products significantly affect the experience that the players have, and the company also operates two casinos. We have therefore found reason to question how the company handles the problem of gambling addiction.

Pareto Global held shares in Playtech, but the position is now sold. While this is not a consequence of exclusion, active managers will of course consider such issues as we have problematised here.

Goldman Sachs

In the period 2009 to 2014, Goldman Sachs organised the issue of bonds for Malaysia's Government Investment Fund 1 Malaysia Development Bhd ("1MDB") for a total of \$ 6.5 billion. The fund was given free reins, with no independent supervision.

However, a large amount was allegedly transferred illegally to bank accounts in tax havens and spent on art, luxury boats and funding for the Oscar-nominated movie The Wolf of Wall Street. Furthermore, part of the money was allegedly used to bribe civil servants in Malaysia and Abu Dhabi, including Malaysia's then prime minister. Both Malaysian and US authorities were of the opinion that the bank could have done more to prevent the embezzlement and bribery. They also questioned the size of the commission, \$600 million.

Goldman Sachs later entered into settlements with both Malaysia and the US Department of Justice. These settlements entailed fines and guarantees totalling more than \$6 billion, while Goldman Sachs avoided being declared guilty.

We have concluded that the case is resolved. It certainly deserves criticism, but time has passed, we feel that the company has "served its time" and they have obviously worked to ensure that something like this does not happen again. We therefore remove this share from our watch list.

Pareto Global owns shares in Goldman Sachs.

The sustainability sustainer – an analyst interview

As a dedicated ESG analyst for our fixed income fund Pareto ESG Global Corporate Bond, Nawel Boukedroun works full time to fulfil the strict requirements of the Nordic Swan Ecolabel, the Nordics' official ecolabel. With the EU taxonomy and the Sustainable Finance Disclosure Regulation (SFDR) coming into effect from this year, Boukedroun is also busy adapting to and implementing the new regulations in her analysis.

– Why did the portfolio management team decide to classify the fund as article 9 fund?

– An important fact to mention first is that in addition to having a sustainable objective, article 9 funds must also include requirements of the article 8 scope. This means that environmental and social characteristics promoted must be binding, measurable and reportable, Boukedroun explains.

– Beyond that, holdings must meet the standard of “do no significant harm”. These aspects have long been a vital part of our management process. Beyond that, Pareto ESG Global Corporate Bond has a sustainable objective along with the goal of producing positive financial returns. The fund is actively looking for viable companies with a bright and sustainable future. We are therefore convinced that the fund meets article 9 expectations.

– In what way, if any, has this classification changed/impacted the portfolio management in the fund?

– This classification has not impacted the portfolio management as it did not introduce a new investment strategy for the fund. We consider SFDR as a formalisation and a disclosure duty of pre-existing ESG practices applied by the management team, says Boukedroun.

Nawel Boukedroun

Titel: ESG analyst

Fund: Pareto ESG Global Corporate Bond

Office: Stockholm

Nawel Boukedroun is part of our fixed income team and works with ESG analysis for our Nordic Swan Ecolabelled fixed income fund. Boukedroun joined Pareto in 2020 from Swiss Life Asset Managers in Paris and holds a Master of Finance from Montpellier Business School, France.



– How has your job as an ESG analyst been affected by the new regulations?

– New regulations have a positive impact on my job, the way I see it. The EU taxonomy aims to uniform criteria to identify if economic activities may be considered “environmentally sustainable”. This will enable us to further limit the ESG risk related to “greenwashing” and overstatements. The framework under the EU taxonomy will urge companies to identify potential risk and measure exposure. This will help to enhance companies’ knowledge on sustainability issues and thus simplify our engagement role.

Boukedroun points out that the objective with SFDR consists of bringing to clients a total transparency on our commitment to allocate assets sustainably.

– This requires maintaining a great deal of work but at the same time allows interesting discussion and collaboration with other experts in the field. A great way to constantly keep learning in order to respond to this fast-changing environment, says Boukedroun.

– What are the main ESG challenges under SFDR, as you see it?

– The lack of available and reliable data at the company level is the main challenge for the time being. The European Commission adopted its final rules through the EU taxonomy on April 21. This is a key step in driving forward transparency for companies and a way for us to collect more reliable input for our analysis. Although we believe that the new European regulations will have a positive influence on the global market, our role is to ensure that all our holdings will match new expectations. This must be done in a short lapse of time to meet the January 2022 SFDR reporting deadline, says Boukedroun.

– I am ready to take on the challenge!

Sustainability objectives

The SFDR seeks to provide greater transparency on the sustainability of financial products, increase the comparability of ESG information and minimise so-called “greenwashing”, i.e. prevent false claims about the sustainability nature of an investment product. In the new framework, funds are categorised into **article 9 funds** (dark green), **article 8 funds** (light green) and **article 6 funds** (all other funds).

Pareto ESG Global Corporate Bond – an article 9 fund

Funds promoted as ESG aligned are required to classify as being Article 8 or Article 9. Article 8 funds “promote environmental and social characteristics”, while Article 9 funds “have sustainable investment as their objective”. Pareto ESG Global Corporate Bond seeks to comply with the highest standards of sustainable investments and has been classified as an Article 9 (“dark green”) fund.





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