



CLIMATE TRANSPARENCY REPORT

2019

Swedbank Robur

About the Climate-related Disclosure Indicators

Climate has been identified as a top priority for PRI signatories, with over 70% of asset owners reporting this as the most important long-term trend they are acting on.

The FSB Task Force's guidance on climate-related financial disclosure aim to create a single framework for disclosure on assessment and management of climate-related risk. The recommendations, supported by investors representing US\$22 trillion, identify four main disclosures, Governance, Strategy, Risk Management, Metrics and Targets, and include specific guidance for asset owners and managers.

As a result, the PRI introduced climate-related disclosure indicators that can be used to align with the TCFD recommendations in the 2019 PRI Reporting Framework.

About this report

This report is an export of only the climate-related indicators from the 2019 Reporting Framework response. The full Public Transparency Report is available here (https://reporting.unpri.org/surveys/PRI-reporting-framework-2019/-2CF3F857-C7B6-4970-BF75-DE020CF99884/00000000-0000-0000-0000-000000000000/doc/2/-%7C%7C*complete*%7C*public*/Merged/). It shows the responses to all the completed climate indicators, even those you chose to keep private. It is designed for your internal review or – if you wish - to share with your stakeholders.

The PRI will not publish this report on its website if you have designated your 2019 climate reporting as “private”. Otherwise, you will be able to access the Climate Transparency Report of your organisation and that of other signatories on the [PRI website](#) and on the [Data Portal](#).

To easily locate information, there is a **Recommendation index** which summarises the indicators that signatories complete and disclose. The report presents information exactly as it was reported as per signatory preference. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory are presented in this report.

TCFD Recommendations Index

Strategy and Governance - CC			TCFD Recommendation			
Indicator	Reported	Disclosure	Governance	Strategy	Risk Management	Metrics & Targets
SG 01.1	✓	Public				
SG 01.2	✓	Public				
SG 01.3	✓	Public				
SG 01.4	✓	Public				
SG 01.5	✓	Public				
SG 01.6 CC	✓	Public				
SG 01.7 CC	✓	Public				
SG 01.8 CC	✓	Public				
SG 01.9 CC	✓	Public				
SG 01.10 CC	✓	Public				
SG 01.11 CC	-	Public				
SG 01.12 CC	✓	Public				
SG 02.2	✓	Public				
SG 07.5 CC	✓	Public				
SG 07.6 CC	✓	Public				
SG 07.7 CC	✓	Public				
SG 07.8 CC	-	Public				
SG 13.1	✓	Public				
SG 13.2	✓	Public				
SG 13.4 CC	✓	Public				
SG 13.5 CC	✓	Public				
SG 13.6 CC	✓	Public				
SG 13.7 CC	✓	Public				
SG 13.8 CC	✓	Public				
SG 14.1	✓	Public				
SG 14.2	✓	Public				
SG 14.3	✓	Public				
SG 14.4	-	Public				
SG 14.5	-	Public				
SG 14.6 CC	✓	Public				
SG 14.7 CC	-	Public				
SG 14.8 CC	✓	Public				
SG 14.9 CC	✓	Public				
SG 15.1	✓	Public				
SG 15.2	-	Public				
SG 15.3	-	Public				

Symbol	Status
✓	The signatory has completed this sub-indicator
-	The signatory did not complete this sub-indicator.
	This indicator is relevant to the named TCFD recommendation
Within the first column "Indicator", indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.	

ORGANISATIONAL OVERVIEW

This section provides an overview of your organisation. These characteristics are used to define your peer groups.

MAIN CHARACTERISTICS	
Name	Swedbank Robur
Signatory Category	Fund Management - Majority
Signatory Type	Investment Manager
Size	US\$ > 50 billion AUM
Main Asset Class	>50% Listed Equity Internally Managed
Signed PRI Initiative	2009
Region	Europe
Country	Sweden
Disclosure of Voluntary Indicators	100% from 38 Voluntary indicators

Swedbank Robur

Reported Information

Public version

Strategy and Governance

PRI disclaimer

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

Investment policy

SG 01

Mandatory

Public

Core Assessed

General

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

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input checked="" type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Engagement policy <input type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3

Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4

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

Swedbank Robur is one of the Nordic region's leading asset managers; we integrate sustainability aspects into all our funds and are constantly working on influencing companies to become better in sustainability and corporate governance. We believe risks within sustainability and corporate governance can affect a fund's return and we therefore have a responsibility to act on these, in part for the long-term interest of our fund unit holders but also to live up to our own and society's values. The overall investment strategy for Swedbank Robur builds on sustainable values to generate return for our clients and to be a long-term active owner that takes part in the public economic discussions as well as having an attractive fund offering for our clients. Our vision is to be world leader in sustainable value creation.

SG 01.5

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

The board of Swedbank Robur adopted a Policy for Responsible Investment in 2015. The policy was implemented throughout all fund prospectuses in 2015-2017, and today applies to all funds. The policy clarifies Swedbank Robur's responsibilities and the focus areas of engagement/ownership work, integration in investment processes and when company exclusion is the option. In 2018 the Policy for Responsible Investments was updated, now further emphasizing the long-term view and commitment to not only fund unitholders, but also society and environment as a whole. Swedbank Robur recognizes that our success in fund management and reputation as a financial player is closely linked to the companies in which we invest; especially the strength of their corporate governance, how effectively they manage environmental and social risks, and how they utilize opportunities and contribute to solving global sustainability challenges. In the policy is also described how the integration of ESG aspects, as well as engagement in ESG-related issues may vary between different asset classes.

Our Ownership policy states the companies' responsibility within the area of sustainability should be in line with the UN's Global Compact principles, which are based on international norms for human rights, working conditions, the environment and business ethics. In order to be competitive in the long term, companies must handle relevant risks and opportunities in the area of sustainability. Such risks and opportunities should be analyzed, evaluated and reported to the Board on an ongoing basis. Companies with significant risks in their operations, such as in the environmental effect, or in their geographic presence, shall have a more developed work.

Swedbank Robur believes that environmental and social issues and matters of business ethics and corporate governance can affect fund returns, and that Swedbank Robur has a responsibility to act in these matters in the best long-term interests of the fund unit-holders.

No

I confirm I have read and understood the Accountability tab for SG 01

I confirm I have read and understood the Accountability tab for SG 01

SG 01 CC	Voluntary	Public	Descriptive	General
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SG 01.6 CC	Indicate the climate-related risks and opportunities that have been identified and factored into the investment strategies and products, within the organisation's investment time horizon.
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Both Swedbank Robur and our parent organisation Swedbank have committed publicly to TCFD and will report on progress during 2018. Swedbank has additionally committed to setting targets under the Science Based Targets Initiative. Our work in implementing TCFD is in the early stages. Non-the-less Swedbank has created a TCFD project group attached to the CFO's office of which two Swedbank Robur staff are core members. This group and our own sustainability group with Swedbank Robur have spread information throughout the organisations on TCFD and the importance of considering climate risks and opportunities in investments and financial products. This includes information on the TCFD identified climate critical sector risks and opportunities, and the extent of our exposure to these sectors. The next steps during 2019 will be to establish a scenario analysis method applicable to our organisations and undertake the analyses at the macro/sector level. On the fund portfolio level we have been active in providing feedback to PACTA, and only recently have felt that the model and report are of a sufficient standard and robustness for portfolio management purposes. PACTA reports were generated for some of the funds during 2018. Moreover, company carbon footprint is an identified and communicated risk internally, as well as being reported externally (revenue based method). Furthermore, our fund managers have access to climate and carbon related data from multiple providers including MSCI, Trucost, Sustainalytics, CDP and ISS-ESG (portal log-ins). PMs are encouraged to access not only carbon intensity related data but also data on the strength of company policies and targets.

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

SG 01.8 CC	Indicate the associated timescales linked to these risks and opportunities.
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PACTA analysis tool is based on the next five years. Financial risks and opportunities in investments are uncertain beyond 5 years as they are closely linked to carbon pricing, which is currently not in place in enough jurisdictions globally to have real effect. The physical effects of climate change are well understood beyond five years.

No

SG 01.9 CC	Indicate whether the organisation publicly supports the TCFD?
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Yes

No

SG 01.10 CC	Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.
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Yes

	Describe
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Swedbank Robur has made this commitment, both in our new policy, our soon to be published 2018 annual report, and in information provided to fund management team leaders. Our policy which was reviewed in Q4 2018 now states: "Swedbank Robur has a particular focus on reducing climate risks in asset management and through investments, driving the long-term transition towards a fossil-free society". Implementing the strategy is now a part of the ESG team's performance based pay. Fund managers will also soon have climate related KPIs linked to pay.

No

SG 1.12 CC	Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.
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- Public PRI Climate Transparency Report
- Annual financial filings
- Regular client reporting
- Member communications
- Other

	specify
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Annual responsible investments s report – Swedbank Robur
Annual report (sustainability integrated) – Swedbank

SG 02	Mandatory	Public	Core Assessed	PRI 6
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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- Policy setting out your overall approach

	URL/Attachment
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- URL

	URL
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{hyperlink:https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html}

- Attachment (will be made public)
- Formalised guidelines on environmental factors

	URL/Attachment
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- URL

URL

{[hyperlink:https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html](https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html)}

- Attachment (will be made public)
- Formalised guidelines on social factors

URL/Attachment

- URL

URL

{[hyperlink:https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html](https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html)}

- Attachment (will be made public)
- Formalised guidelines on corporate governance factors

URL/Attachment

- URL

URL

{[hyperlink:https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html](https://www.swedbank.com/sustainability/subsidiaries/swedbank-robur.html)}

- Attachment (will be made public)
- Asset class-specific RI guidelines
- Sector specific RI guidelines
- Screening / exclusions policy

URL/Attachment

- URL

URL

{[hyperlink:https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1341385](https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1341385)}

- Attachment (will be made public)
- We do not publicly disclose our investment policy documents

SG 02.2

Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account

URL/Attachment

- URL

URL

{hyperlink:https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1341385}

- Attachment
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches

URL/Attachment

- URL

URL

{hyperlink:https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1341385}

- Attachment
- Active ownership approaches

URL/Attachment

- URL

URL

{hyperlink:https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1341360}

- Attachment
- Climate change

URL/Attachment

- URL

URL

{hyperlink:https://online.swedbank.se/ConditionsEarchive/download?bankid=1111&id=WEBDOC-PPE1340534}

- Attachment
- We do not publicly disclose any investment policy components

SG 02.3

Additional information [Optional].

Our webpage describing our work as a Responsible Investor can be found via these link (in SWEDISH):
<https://www.swedbank.com/sv/om-swedbank/dotterbolag/swedbank-robur/ansvarsfulla-investeringar.html>
English version to be published in April.

Governance and human resources

SG 07 CC	Voluntary	Public	Descriptive	General
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SG 07.5 CC Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.

Board members or trustees

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

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee

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

Other Chief-level staff or head of department

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

Portfolio managers

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

Dedicated responsible investment staff

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

Other role, specify (1)

Other description (1)

Other role, specify (1)

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

SG 07.6 CC	For board level roles for which have climate-related issues oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.
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Members of the Swedbank Robur Board have undergone basic training in key sustainability issues per sector which includes information on climate critical branches. They are regularly informed on material ESG issues. Swedbank Robur also has representatives on the Nomination Committees of 80 Swedish companies in which we are invested. They are responsible for understanding the key ESG issues for their sectors and companies, assessing the competence of Board members to appropriately manage these issues, and then selecting the best candidates.

SG 07.7 CC	For the management-level roles that assess and manage climate-related issues, provide further information on the structure and process involved.
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Swedbank Robur has a system of quarterly meetings with our Sustainability Council, where discussions and decisions are taken on climate and ESG issues relating to policy, strategy, fund products, exclusions, investments etc. The council comprises the CEO, CIO, Head of Sales, Head of Business & Product development and the Head of Sustainability.

ESG issues in asset allocation

SG 13	Mandatory	Public	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
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- Yes, to assess future ESG factors
- Yes, to assess future climate-related risks and opportunities

	Describe
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- We have trialed the PACTA tool for some of our listed equity portfolios.
- No, not to assess future ESG/climate-related issues

SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
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	We do the following
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- Allocation between asset classes
 - Determining fixed income duration
 - Allocation of assets between geographic markets
 - Sector weightings
 - Other, specify
- To assess future climate-related risks and opportunities we have performed scenario analysis on some of the listed equity portfolios.
- We do not consider ESG issues in strategic asset allocation

SG 13.3 Additional information. [OPTIONAL]

Strictly speaking Swedbank Robur does not conduct its own scenario analysis or modelling on ESG issues. We do however closely evaluate and take into account in investment decision making the regular specialist research from our service providers, as well as the robust evidence in the public domain and the responsible investing branch on ESG issues. During 2018 we used the PACTA tool and made scenario analysis for some of our listed equity portfolios. Our aim is to act on this existing knowledge in the near term in order to maximise ESG related opportunities and minimise and risk and impact. During 2018 we launched a new fund called Global impact for which all SDGs are taken into consideration, any investment in that portfolio must contribute to at least one of the SDGs. The fund along with the other sustainability funds may work as idea generators for other portfolios in further integrating ESG and/or SDG's issues into our stock picking and product fund offerings

SG 13 CC	Voluntary	Public	Descriptive	General
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SG 13.4 CC Describe how the organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, the results and any future plans.

- Initial assessment

Describe

We have trialed the PACTA tool for some of our listed equity portfolios.

- Incorporation into investment analysis
- Inform active ownership
- Other

SG 13.5 CC Indicate who uses this analysis.

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

SG 13.6 CC Indicate whether the organisation has evaluated the impacts of climate-related risk, beyond the investment time-horizon, on the organisations investment strategy.

- Yes
- No

Please explain the rationale

Swedbank Robur is in the preliminary stages of scenario analyses. A more comprehensive project will get underway during 2019 at the Swedbank level which will most likely include longer term scenario modelling.

**SG 13.7
CC**

Indicate whether a range of climate scenarios is used.

- Yes, including analysis based on a 2°C or lower scenario
- Yes, not including analysis based on a 2°C or lower scenario
- No, a range is not used

**SG 13.8
CC**

Indicate the climate scenarios the organisation uses.

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

SG 14	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1
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SG 14.1	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.
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- Changing demographics
- Climate change
- Resource scarcity
- Technological developments
- Other, specify(1)
- Other, specify(2)
- None of the above

SG 14.2	Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity
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- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Phase out your investments in your fossil fuel holdings
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

SG 14.3	Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.
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- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify
- None of the above

SG 14 CC	Voluntary	Public		General
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**SG 14.6
CC** Please provide further details on these key metric(s) used to assess climate related risks and opportunities.

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Carbon footprint (scope 1 and 2)	<input type="checkbox"/> All assets <input checked="" type="checkbox"/> Majority of assets <input type="checkbox"/> Minority of assets	PACTA for some equity portfolios, scope 1&2 carbon footprint reporting internally and externally, general informing of management and portfolio managers of risks and opportunity, provision of key climate data to fund managers within equities during 2018, with roll-out into fixed income in 2019 planned.	tCO2e/mSEK	Use the agreed upon methodology that the Swedish Investment Fund associations promotes

**SG 14.8
CC** Indicate whether climate-related risks are integrated into overall risk management and explain the risks management processes for identifying, assessing, and managing climate-related risks.

- Process for climate-related risks is integrated into overall risk management

Please describe

Swedbank and Swedbank Robur's risk and compliance groups are well informed and involved in our TCFD work. The Swedbank team will lead the scenario and financial impact analysis part of the project during 2019. Swedbank (including Robur) is the only major Nordic bank to carry and ISO14001 certification, which means we have an established sustainability management system which can easily integrate the TCFD system (governance, strategy, risk management and KPI's) for managing climate related issues and risk exposures.

- Process for climate-related risks is not integrated into our overall risk management

**SG 14.9
CC** Indicate whether the organisation undertakes active ownership activities to encourage TCFD adoption.

- Yes

Please describe

At Swedbank Robur we contacted 425 companies on sustainability issues during 2018, as well voting at 424 AGMs. Our representatives sat on 91 nomination committees. Our own analysts contacted 186 companies and held meetings with about half of these during the year. Valuable information exchanges and resulting influence were made with the majority. Climate was on the agenda in the majority of our company contacts and meetings, and within certain collaborative engagements through PRI and Climate Action100+ the adoption of TCFD was a central theme.

- No, we do not engage

SG 15	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1
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SG 15.1

Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

- Yes
- No