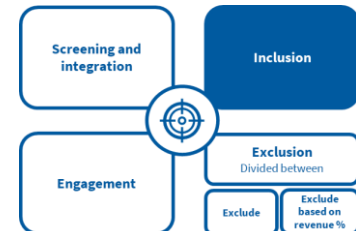


Transition criteria and list of transition companies per fourth quarter 2025

Länsförsäkringar AB applies several responsible investment strategies which ensures that sustainability (also referred to as 'ESG') factors are integrated into the investment process of investment portfolios and funds (see figure). The purpose is to improve the long-term return conditions of assets under management while at the same time contribute to a subset of the UN's global sustainability goals and counteract negative consequences for sustainable development.



One of the strategies is named **inclusion**. It involves, among other things, the application of sustainability-related transition criteria in the investment process. These criteria aim to identify companies in transition which over time can contribute to reduce negative climate impact. The transition criteria should be seen as complementary to the exclusion criteria ([link](#)).

Länsförsäkringar's climate ambition

Länsförsäkringar AB (LFAB) has adopted a climate ambition to support the low-carbon transition and the Paris Agreement's objective to limit global warming. For LFAB asset management, this vision means that their own investment portfolios and funds as a whole should be climate neutral by 2045. An interim target towards achieving this vision is to harmonise the portfolios and funds by 2030 with an emission trajectory equivalent to limiting climate change to 1.5 degrees Celsius.

In line with this vision, LFAB has introduced climate focused transition criteria. The rationale for introducing them is because criteria based on revenue shares alone (e.g. 5 %) in certain cases can disqualify companies that have made a commitment and are transitioning. For example, some companies are in the process of shifting towards a more sustainable energy mix, away from fossil fuels. Hence, it is likely that these companies over time reduce their climate emissions significantly. This type of transition might not necessarily be identified by a backward-looking metric that is often used in exclusion criteria.

Design of transition criteria

Transition criteria have been applied by LFAB on certain **utility/power generation companies** since 2019. Since 2021 transition criteria have also been applied on certain **energy companies**. This means that LFAB may consider investing in individual companies in these sectors based on an integrated analysis, applying financial and ESG perspectives and related criteria. As part of the ESG analysis, different criteria are applied through the following four perspectives to determine whether a company is considered to be in transition:

- **Commitments:** science-based climate targets or equivalent climate targets set by the company;
- **Actions:** strategic plans, taxonomy aligned revenues and CAPEX investments, and the company's management of climate risk using data from [Transition Pathway Initiative](#) (TPI);
- **Trend (outcome):** the company's CO₂ emission trend over time, based on actions (historically);
- **Forecast:** forward looking analysis of company's CO₂ emission trajectory over time against what is necessary for the sector according to the Paris Agreement.

Commitment

Actions

Trend (outcome)

Forecast
(CO₂-emissions)

The transition criteria are dynamic as the underlying data from companies and third parties are continuously being updated and reviewed. The list of companies considered to be in transition is therefore likely to change over time. The transition criteria per sector are described below together with a list of companies that currently are considered to fulfill them.

Specific transition criteria linked to utility/power generation companies

Länsförsäkringar AB may consider retaining companies with 5-20 % of revenue from thermal coal [power generation](#)¹ in the investment universe. To conclude whether certain companies are in transition an analysis covering the mentioned perspectives above and related criteria is conducted. As complementary criteria, a company's energy mix in terms of share from fossil fuels versus renewables is also considered in the analysis (share of the company's revenue from renewable energy production must exceed that from fossil energy).

Utility/power generation companies considered to be in transition

[13 companies](#) within Länsförsäkringar AB's reference indices (Global and Sweden) are considered to fulfil most or all transition criteria and are thereby considered to be in transition. Although the companies are retained in the investment universe, this does not automatically imply that Länsförsäkringar Life Asset Management and/or Länsförsäkringar's Mutual Fund Company invest in them.

Company name	Assessment against transition criteria
American Electric Power Company, Inc.	The overall assessment is positive with (3/4) criteria met: Commitment, Action, Trend, Forecast
CenterPoint Energy, Inc.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
CEZ, a. s.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
China Longyuan Power Group Corporation Limited	Share of the company's revenue from renewable energy production exceeds that from fossil energy.
Dominion Energy, Inc.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
Duke Energy Corporation	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
NiSource Inc.	Revenue share from renewable energy exceeds the revenue share from fossil fuel power generation
NRG Energy, Inc.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
Public Power Corporation S.A.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
RWE Aktiengesellschaft	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
The Kansai Electric Power Company, Incorporated	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
Vistra Corp.	The overall assessment is positive with (4/4) criteria met: Commitment, Action, Trend, Forecast
Xcel Energy Inc	The overall assessment is positive with (3/4) criteria met: Commitment, Action, Trend

Specific transition criteria for energy companies

Länsförsäkringar AB also applies transition criteria on selected [energy companies](#).

¹ Figures on revenue share are based on company information from licensed database as per September 2025.

Energy companies considered to be in transition

No company within LFABs reference indices (Global and Sweden) currently fulfils most or all transition criteria for energy companies.