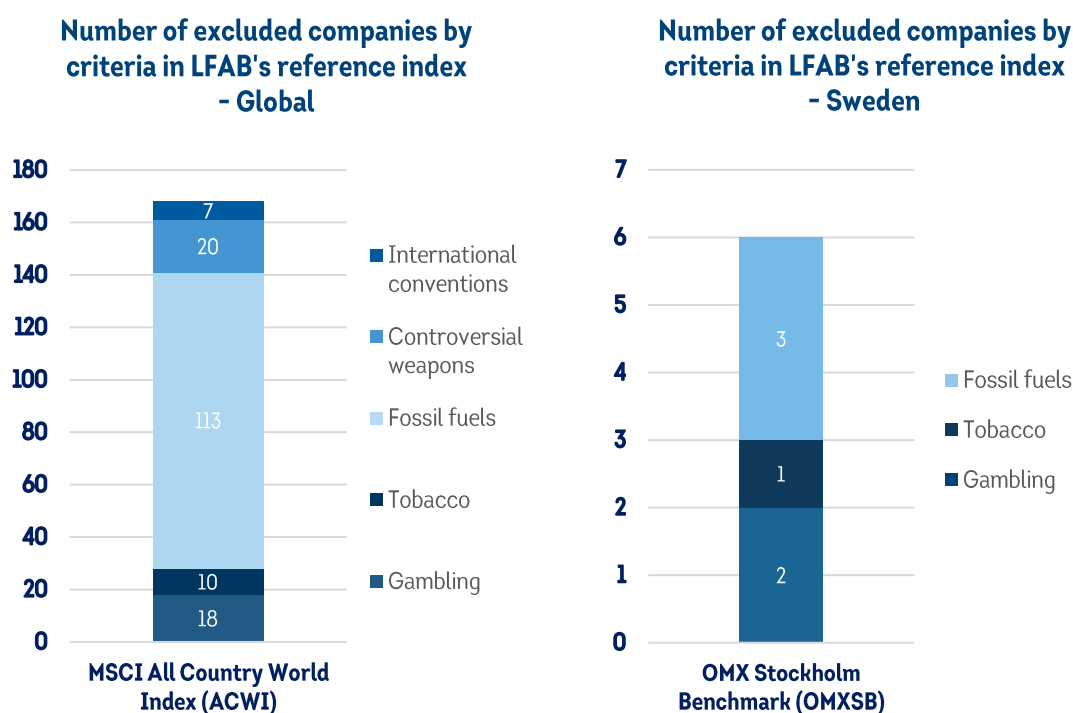


Exclusion criteria per the first quarter 2022

Länsförsäkringar AB (LFAB), together with its subsidiaries, apply sustainability (also referred to as 'ESG') related exclusion criteria in its investments. These criteria are applied by Länsförsäkringar Liv's Asset Management (Länsförsäkringar Livs Kapitalförvaltning) and Länsförsäkringar Mutual Fund Company (Länsförsäkringar Fondförvaltning) to direct investments in listed equities and corporate bonds, as well as in government bonds¹.

The assets, to which these criteria apply, are linked to Länsförsäkringar AB's own funds as well as its life and non-life insurance portfolios. The applicable exclusion criteria and its impact on respective chosen reference index are outlined in the graphs below. More detailed descriptions of each criteria are presented on the following pages.

Exclusion criteria and number of excluded companies within applicable indices²



Länsförsäkringar AB also strives to influence external asset managers, both with regards to their approach to responsible investments and their existing ESG related exclusion criteria. We exert our influence and conduct engagement in connection with the selection and ongoing evaluation of external managers. The aim is to collaborate with sustainability focused external managers, which is one of our prioritised areas within responsible investments.







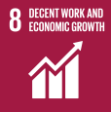



Another prioritised area within responsible investments is active ownership. As active owners we engage in dialogue with companies that breach, or are at risk of breaching, our exclusion criteria. These dialogues are either conducted bilaterally, in collaboration with other investors and/or together with other external parties with the aim to communicate LFAB's expectations and inform our analysis.

¹ Exclusion criteria are also applied by Länsförsäkringar Liv's Asset Management for new investments in illiquid funds (typically named private equity and private lending funds).

² Companies outside of LFAB's reference indices are also screened against LFAB's exclusion criteria, see page 2.

Scope of exclusion criteria

The table presents our ESG exclusion criteria against companies and states. The criteria are either binary ('Exclude', no revenues permitted) or applied with a revenue share threshold ('Avoid'). The table provides an overview of the types of criteria applied, together with the associated revenue share threshold when applicable. It also shows how companies and states, that through its economic activities meet the various criteria, in turn have adverse impacts on sustainability and counteract a subset of the UN Sustainable Development Goals (SDGs) and the ambitions behind Agenda 2030.

Focus of exclusion criteria	Type of criteria and threshold ³ for exclusion	Counteracts SDG number
Serious violations of international conventions	Exclude (no revenue share threshold applied)	 Linkages to individual SDG varies
Controversial weapons	Exclude (no revenue share threshold applied)	
Fossil fuels (thermal coal, oil and gas)	Avoid, revenue share threshold: <ul style="list-style-type: none"> Thermal coal >5% Unconventional extraction of oil and gas >5% Exploration and conventional extraction of oil and gas >5% 	  
Tobacco	Avoid, revenue share threshold: <ul style="list-style-type: none"> Production of tobacco products >5% 	  
Gambling (online gambling and land-based gambling such as casinos)	Avoid, revenue share threshold: <ul style="list-style-type: none"> Online gambling >5% Land-based gambling >5% 	
Human rights, democracy, corruption and tax (applied to sovereign bonds and listed state-controlled companies)	Exclude (no revenue share threshold applied)	

List of excluded companies and states per the first quarter 2022

On the following pages companies and states are listed that currently meet LFAB's exclusion criteria within our reference indices (Global and Sweden). A complete list of all identified companies that meet the existing exclusion criteria can be shared upon request – please contact esg@lansforsakringar.se.

New and supplementary data, both ESG and financial, is continuously integrated into the investment process. LFAB's assessment of individual companies and states may be subject to change.

[New companies and states added to the list this quarter are indicated with a * on the following pages.](#)

³ According to guidelines from the Swedish Investment Fund Association, a 5% revenue share threshold is typically applied to determine involvement in sectors or economic activities that meet the exclusion criteria. This approach with thresholds is also commonly applied by providers of ESG-related data to categorize corporate involvement in certain sectors/activities.

Serious violations of international norms and conventions

Länsförsäkringar AB does not make direct investments in companies which are assessed to violate international principles for responsible business and associated conventions, and where active ownership activities with the company has not reached the desired outcome.

In Länsförsäkringar AB's regular screening process to identify potential companies involved in violations, the following standards are applied: the UN's Global Compact Principles for responsible business conduct (covering the environment, human rights, labour rights, and anti-corruption), the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and associated international conventions (see full list via [link](#)). The following companies are considered to be involved in serious violations and are for the time being excluded.

- **Enbridge Inc.**
- **Inner Mongolia Baotou Steel Union Co. Ltd.**
- **Metallurgical Corporation of China Ltd.**
- **PetroChina Co Ltd.**
- **Phillips 66**
- **Ratch Group Public Co. Ltd.⁴**
- **Vale ON**

Controversial weapons

Länsförsäkringar AB does not make direct investments in companies which are assessed to be involved with nuclear weapons, cluster weapons, anti-personnel mines, biological and chemical weapons, depleted uranium, and white phosphorus.

- **Airbus group**
- **Aselsan Elektronik Sanayi ve Ticaret Anonim Sirketi**
- **BAE Systems PLC**
- **Boeing Co.**
- **Dassault Aviation S.A.**
- **Elbit Systems Ltd.**
- **General Dynamics Corp.**
- **Honeywell International**
- **Huntington Ingalls Industries, Inc.**
- **ICL Group Ltd.***
- **Jacobs Engineering Group Inc.**
- **L3Harris Technologies, Inc.***
- **Larsen & Toubro Limited**
- **Leidos Holdings Inc***
- **Lockheed Martin Group**
- **Northrop Grumman Corp.**
- **Raytheon Technologies Corp.**
- **Safran SA**
- **Textron Inc.**
- **Thales SA**

Fossil fuels

Länsförsäkringar AB does not make direct investments in the following companies with fossil fuel⁵ involvement:

- companies, typically mining or utility companies, that derive more than 5 percent of their revenue from thermal coal, except for companies that meet the transition criteria⁶,
- energy companies that derive more than 5 percent of their revenue from exploration and *conventional* production of oil and gas, except for companies that meet the transition criteria⁶,

⁴ The company is also excluded due to its involvement in thermal coal.

⁵ Figures on fossil fuel revenue share are based on company information from S&P Global Trucost's database as per December 2021.

⁶ See detailed description of our transition criteria and separate list of companies in transition on our website ([link](#)).

- energy companies that derive more than 5 percent of their revenue from *unconventional* extraction of oil and gas, or,
- companies, when applicable, with significant oil reserves and production where the prospects for meaningful active ownership are deemed to be insufficient.

Länsförsäkringar AB may, referring to our transition criteria mentioned above, consider retaining certain utility and energy companies if they are deemed to be in transition. We conduct an analysis of companies against our various climate focused transition criteria on a regular basis to inform our decision.

Thermal coal – extraction and/or for energy production (utilities)

- | | |
|---------------------------------------------------------|------------------------------------------------------------------------|
| • Aboitiz Equity Ventures, Inc. | • Entergy Corporation |
| • AC Energy Corporation | • Evergy, Inc. |
| • Adani Enterprises Limited | • Exxaro Resources Limited |
| • Adani Transmission Limited | • FirstEnergy Corp. |
| • Alliant Energy Corporation | • Formosa Chemicals & Fibre Corporation |
| • Ameren Corporation | • Formosa Petrochemical Corporation |
| • American Electric Power Company, Inc. | • Fortis Inc. |
| • Anglo American Plc | • GD Power Development Co., Ltd |
| • BHP Group Ltd | • Global Power Synergy Public Company Limited |
| • BHP Group PLC | • Guangdong Investment Limited |
| • China Coal Energy Company Limited | • Guanghui Energy Co., Ltd.⁷ |
| • China Power International Development Limited | • HK Electric Investments and HK Electric Investments Limited |
| • China Resources Power Holdings Company Limited | • Huaneng Power International, Inc. |
| • China Shenhua Energy Company Limited | • Inner Mongolia Junzheng Energy & Chemical Group Co., Ltd. |
| • Chubu Electric Power Company, Incorporated | • KEPCO (Korea Electric Power)* |
| • CLP Holdings Limited | • Ningxia Baofeng Energy Group Co., Ltd. |
| • CMS Energy Corporation | • NiSource Inc. |
| • Coal India Limited | • NTPC Limited |
| • Dominion Energy, Inc. | • Origin Energy Limited |
| • DTE Energy Company | • PGE Polska Grupa Energetyczna S.A. |
| • Duke Energy Corporation | • Polskie Gornictwo Naftowe⁸ |
| • Electricity Generating Public Company Limited | • PPL Corporation |
| • Emera Incorporated | • PT Adaro Energy Tbk |
| • Endesa, S.A. | • PT Astra International Tbk* |
| • ENN Natural Gas Co., Ltd. | • PT United Tractors Tbk |

⁷ The company is also excluded due to its involvement in conventional oil and gas.

⁸ The company is also excluded due to its involvement in conventional oil and gas.

- Public Joint Stock Company Inter RAO UES
- Public Power Corporation S.A.
- RWE Aktiengesellschaft
- SDIC Power Holdings Co., Ltd.
- Shaanxi Coal Industry Company Limited
- Shanxi Coking Coal Energy Group Co., Ltd.
- Shenergy Company Limited
- Shenzhen Energy Group Co., Ltd.
- South32 Limited
- TBEA Co., Ltd.
- Tenaga Nasional Berhad
- The AES Corporation
- The Kansai Electric Power Company, Incorporated
- The Southern Company
- The Tata Power Company Limited
- Tokyo Electric Power Company Holdings, Incorporated
- United Company RUSAL Plc
- Vedanta Limited
- Vistra Energy Corp.
- Washington H. Soul Pattinson and Company Limited
- WEC Energy Group, Inc.
- Xcel Energy Inc.
- Yanzhou Coal Mining Company Limited

Oil and gas - unconventional⁹

- Canadian Natural Resources Limited
- Cenovus Energy Inc.
- ConocoPhillips
- Coterra Energy Inc
- Devon Energy Corporation
- Diamondback Energy Inc
- EOG Resources Inc
- Hess Corp
- Imperial Oil Limited
- Occidental Petroleum Corp
- Pioneer Natural Resources Co
- Suncor Energy Inc.
- Teck Resources Limited
- Tourmaline Oil Corp

Oil and gas – exploration and conventional¹⁰

- Africa Oil Corp*
- Aker BP ASA
- BP p.l.c.
- Chevron Corporation
- China Oilfield Services Limited
- China Petroleum & Chemical Corporation*
- Ecopetrol S.A.
- Eni S.p.A.
- Exxon Mobil Corporation
- Galp Energia, SGPS, S.A.
- Inpex Corporation
- International Petroleum Corporation
- Lundin Energy AB (publ)
- Oil and Natural Gas Corporation Limited
- Oil Search Limited
- OMV Aktiengesellschaft
- PAO NOVATEK
- Petrobras SA
- PJSC LUKOIL
- PJSC Tatneft

⁹ Unconventional oil and gas refer to companies involved in the extraction of oil from oil sands, the extraction of shale oil and shale gas by so called 'fracking' methods, and the extraction of coalbed methane.

¹⁰ Exploration and conventional oil and gas extraction refers to companies involved in integrated oil & gas, oil & gas drilling, oil & gas exploration & production.

- **PTT Exploration and Production Public Company Limited**
- **Public Joint Stock Company Gazprom**
- **Public Joint Stock Company Rosneft Oil Company**
- **Repsol, S.A.**
- **Royal Dutch Shell PLC**
- **Santos Limited**
- **Saudi Arabian Oil Co (Saudi Aramco)¹¹**
- **Surgutneftegas Public Joint Stock Company**
- **Woodside Petroleum Ltd**

Tobacco

Länsförsäkringar AB does not make direct investments in companies which derive more than 5 percent of their revenue from the production of tobacco products.

- **Altria Group**
- **British American Tobacco**
- **Eastern Company SAE**
- **PT Gudang Garam Tbk**
- **Imperial Brands Plc**
- **ITC**
- **Japan Tobacco Inc.**
- **KT&G Corp (Korea Tobacco & Ginseng Corp)**
- **Philip Morris International**
- **Swedish Match AB**

Gambling

Länsförsäkringar AB does not make direct investments in companies which derive more than 5 percent of their revenue from commercial online gambling or commercial land-based gambling.

Commercial online gambling

The exclusion criteria cover companies involved in the development, maintenance, management and/or marketing of activities that involve online gambling at casinos, slot machines and/or poker (or the equivalent).

- **Entain PLC (previously GVC Holdings Plc)**
- **Evolution Gaming Group**
- **Flutter Entertainment PLC**
- **Greek Organisation of Football Prognostics (OPAP)**
- **Kindred Group plc**

Commercial land-based gambling

The exclusion criteria cover companies involved in land-based gambling operations, typically referred to as casino operators, that offers gambling at casinos, slot machines and/or poker (or the equivalent).

- **Aristocrat Leisure LTD**
- **Caesars Entertainment Inc.**
- **Crown Resorts Limited**
- **Galaxy Entertainment Group Limited**
- **Genting Berhad**
- **Genting Malaysia BHD**
- **Genting Singapore Plc**
- **Kangwon Land Corp.**
- **Las Vegas Sands Corp.**
- **Melco Resorts & Entertainment Ltd**
- **MGM Resorts International**
- **Sands China Ltd.**

¹¹ Excluded due to significant oil reserves and production, and lack of prospects for meaningful active ownership.

- **TABCORP HOLDINGS LIMITED**

- **Wynn Resorts Ltd.**

Sovereign states and jurisdictions as well as state-controlled companies

Länsförsäkringar AB does not make direct investments in government bonds issued by certain states and jurisdictions for the reasons described below. Furthermore, no direct investments are made in state-controlled listed Russian companies.

Sovereign states and jurisdictions - human rights, democracy, and corruption

The exclusion criteria cover states that on an overarching level are assessed to be authoritarian, not free, corrupt and violate human rights. Sovereign states that meet these criteria are considered to have adverse impacts on sustainable development.

- **Afghanistan**
- **Belarus (Republic of Belarus)**
- **Burundi**
- **Democratic Republic of the Congo (DRC)**
- **Equatorial Guinea**
- **Libya**
- **North Korea**
- **Republic of the Congo (Congo-Brazzaville)**
- **Russia (Russian Federation)**
- **Sudan**
- **Syria**
- **Turkmenistan**
- **Venezuela**
- **Yemen**

Direct investments in sustainability-themed bonds from multilateral development banks are not subject to these criteria, even in cases when states on the list above can both be beneficiaries of funding as well as shareholders of the bank (or equivalent organization). Proceeds from these types of sustainability-themed bonds are generally earmarked and intended to contribute to a more sustainable development within the respective country.

Sovereign states and jurisdictions - tax

The exclusion criteria cover states or jurisdictions that are assessed to not meet fundamental tax governance standards, such as counteracting tax evasion and avoidance, as well as money laundering. States or jurisdictions that meet the criteria are considered to have adverse impacts on sustainable development. Several of the states and jurisdictions below can be found on the EU list of non-cooperative jurisdictions for tax purposes. The EU list is typically updated twice a year.

- **American Samoa**
- **Anguilla**
- **Barbados**
- **Dominica**
- **Fiji**
- **Guam**
- **Palau**
- **Panama**
- **Samoa**
- **Seychelles**
- **Trinidad and Tobago**
- **US Virgin Islands**
- **Vanuatu**

State-controlled listed Russian companies

Based on Russia's military invasion of Ukraine, violations of international law and human rights, listed Russian companies that are controlled, through majority ownership, by the Russian state and / or regions of Russia are excluded. A majority ownership indicates that the Russian government is in full

control of the individual company. Exclusion of Russian companies only affects Länsförsäkringar Fondförvaltning (mutual fund company) as two of its funds have emerging markets in their strategy.

- **Aeroflot**
- **Alrosa**¹²
- **RusHydro**
- **Rosseti**
- **Sberbank**¹²
- **Sovcomflot**
- **Transneft**
- **VTB Bank**¹²
- **United Aircraft Corporation**

¹² In the Emerging Market Funds ("Tillväxtmarknadsfonderna") three companies, judged to be controlled by the Russian state, have been identified. A decision to exclude these companies has been made. Länsförsäkringar

Fondförvaltning has instructed the external manager of respective fund to sell off the three companies linked to the Russian state as soon as possible (when trading on the stock exchange is re-established).