

Sustainability-related disclosures

2 January 2023

Transparency of the promotion of environmental or social characteristics

This document includes information relating to environmental and social characteristics of financial products and information relating to sustainable investments, in accordance with article 10 of the Sustainable Finance Disclosure Regulation (SFDR)¹.

Product name Tailor-Made Discretionary offering

Legal entity identifier: Nordea Bank Abp: LEI: 529900ODI3047E2LIV03

Summary

The financial product promotes certain environmental and/or social characteristics. While this financial product does not commit to invest in a minimum proportion of sustainable investments, it may make such investments.

The financial product comprise exclusively of funds managed by Nordea Asset Management (NAM); a minimum of 80% of its assets are invested in funds promoting environmental and/or social characteristics (i.e. funds which are categorised as SFDR Article 8 or 9) and maximum 20% of its assets are invested in funds that lacks environmental and/or social characteristics (i.e. funds which are categorised as SFDR Article 6).

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

No sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes <input checked="" type="radio"/> <input type="radio"/> No	
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective : ___%	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective : ___%	<input type="checkbox"/> with a social objective
	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments

The financial product promotes certain environmental and/or social characteristics. While this financial product does not commit to invest in a minimum proportion of sustainable investments, it may make such investments.

Environmental or social characteristics of the financial product

This financial product offers discretionary portfolio management (DPM) solutions with individual risk profiles.

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The E/S characteristics considered by Nordea Asset Management (NAM) include:

ESG focused selection of investments

NAM takes environmental, social and governance (ESG) into consideration in the selection of the underlying financial instruments. The underlying financial instruments must be aligned with [Nordea’s Responsible Investment Product Distribution Policy](#).

Sector and value-based exclusions

NAM applies exclusion filters to the investments in the underlying financial instruments to restrict investments in companies and issuers with material exposure to certain activities deemed to be detrimental to the environment or society at large. The financial instruments must adhere to the exclusion criteria of [Nordea's Responsible Investment Product Distribution Policy](#). These exclusion criterias cover illegal weapons, nuclear weapons, coal mining, oil sand and Arctic drilling of fossil fuels.

Furthermore, the underlying financial instruments must adhere to NAM's Paris-Aligned Fossil Fuel policy whereby the underlying financial instruments, with the exception of the tactical asset allocation fund, will not invest in companies that have significant exposure to fossil fuels unless they have a credible transition strategy.

Investment strategy

Description of the investment strategy used to meet the environmental or social characteristics of the financial product

The financial product is constructed using a combination of funds managed by Nordea Asset Management (NAM), to meet the clients risk profile and investment guidelines. The portfolio construction is based on funds that provide exposure to various asset classes while contributing to the E/S characteristics of the portfolios. The weight of each financial instrument in the portfolio may vary to accommodate individual risk profiles.

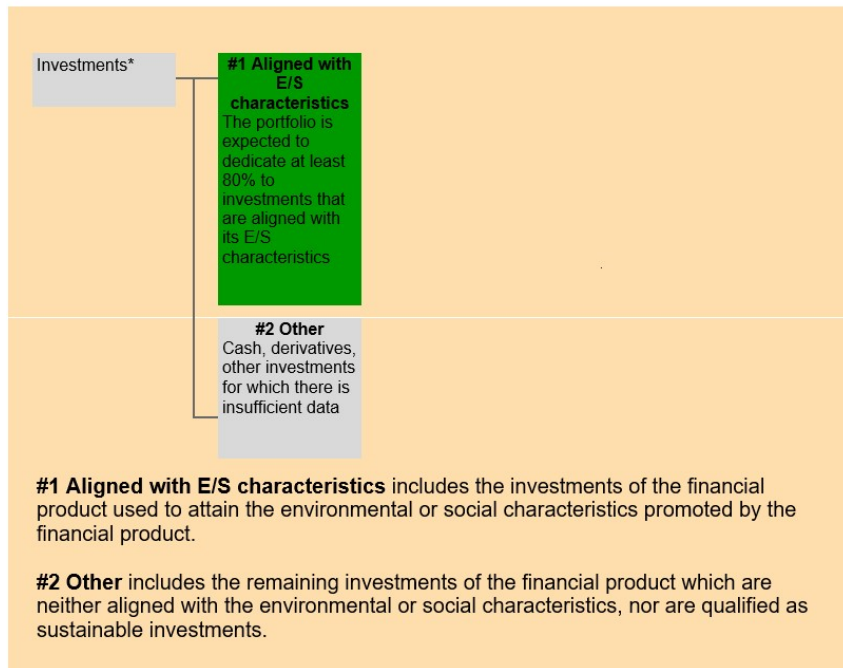
The financial product comprise exclusively of funds managed by Nordea Asset Management (NAM); a minimum of 80% of its assets are invested in funds promoting environmental and/or social characteristics (i.e. funds which are categorised as SFDR Article 8 or 9) and maximum 20% of its assets are invested in funds that lacks environmental and/or social characteristics (i.e. funds which are categorised as SFDR Article 6).

Description of the policy to assess good governance practices of the investee companies

NAM are screening investee companies for good governance practices by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.

Proportion of investments

Illustrated below is the planned asset allocation for the investments of the financial product.



*Investments means the financial product's NAV which is the total market value of the financial product.

The asset allocation may change over time and percentages should be seen as an average over an extended period of time. Calculations may rely on incomplete or inaccurate company or third party data.

Monitoring of environmental or social characteristics

The financial product invests in funds managed by Nordea Asset Management (NAM).

Description of how the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product are monitored throughout the lifecycle of the financial product and the related internal or external control mechanisms.

Information how NAM is monitoring environmental or social characteristics in their funds are available upon request.

Methodologies for environmental or social characteristics

The financial product invests in funds managed by Nordea Asset Management (NAM).

Description of the methodologies to measure how the social or environmental characteristics promoted by the financial product are met.

Information about NAM's methodologies to measure environmental or social characteristics in their funds are available upon request.

Data sources and processing

The financial product invests in funds managed by Nordea Asset Management (NAM).

(a) What are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?

Information about the data sources used by NAM to measure environmental or social characteristics in their funds are available upon request.

(b) What are the measures taken to ensure data quality?

Information about the data quality measures taken by NAM is available upon request.

(c) How are data processed?

Information how NAM process data is available upon request.

(d) What proportion of data is estimated?

Information about the proportion of data being estimated by NAM is available upon request.

Limitations to methodologies and data

The financial product invests in funds managed by Nordea Asset Management (NAM).

(a) Are there any limitations to the methodologies and data sources used?

Information about NAM's methodology and data source limitations are available upon request.

(b) How do those limitations not affect how the environmental or social characteristics promoted by the financial product are met?

Information about NAM's methodology and data source limitations are available upon request.

Due diligence

Description of the due diligence carried out on the underlying assets of the financial product, including the internal and external controls on that due diligence.

Nordea is carrying out due diligence on NAM.

Engagement policies

Description of the engagement policies implemented where engagement is part of the environmental or social investment strategy, including any management procedures applicable to sustainability-related controversies in investee companies.

NAM funds are subject to engagement if investee companies encounter sustainability-related controversies that are in breach with the Responsible Investment Product Distribution Policy.

Designated reference benchmark

Description of whether an index has been designated as a reference benchmark to meet the environmental or social characteristics of the financial product and how such index would be aligned with the environmental or social characteristics of the financial product.

The financial product uses a benchmark that is not aligned with the product's E/S characteristics.

Appendix - Amendments

Version	Review type	Amendment	Date of version
1	First version	First version of product-specific SFDR article 10 statement aligned with the SFDR regulatory technical standards published	2 January 2023