

## **Human Rights:**

### Assessment/Policy/Goals:

- SKAGEN is a signatory to the UN Global Compact, committing us to support the ten principles, including human rights.
- As part of Storebrand we are also included in their extensive Code of Conduct policies.
- SKAGEN has its own Code of Conduct policy available on its intranet and included in all new employee contracts and personnel handbook.
- SKAGEN has its own Whistle Blowing Policy.
- SKAGEN recently published its Diversity & Inclusion policy.
- SKAGEN has selected SDG 5 as one of three main goals to focus on.

### Implementation:

- SKAGEN has an Occupational Environment Committee, with two employee elected employee representatives, working to establish and ensure a fully satisfactory working environment in SKAGEN. Employees can approach the employee representatives and anonymously report any misgivings or other whistleblowing concerns.
- SKAGEN has an easily accessible statutory notification online form to report concerns or wrong doings with the possibility to do so anonymously.
- SKAGEN has during the year had a heightened focus on diversity and inclusion and has provided training on gender/diversity bias to all employees.
- All employees must have an Ethics training annually.

### Measurement of outcomes:

- SKAGEN has specific information on how it deals with any concerns or violations on any human rights in the company.
- SKAGEN has increased its awareness training on inclusion and gender with bias themed internal learning sessions.
- SKAGEN has joined a local gender initiative called 50/50 committing to measure and improve gender issues in the company.
- SKAGEN annually participates in the She Index survey and was in 2020 ranked at number 12 in the country, with a score of 87 out of a total of 100.
- SKAGEN has a total of 40% women in the board, and in the senior management.

## **Labour:**

### Assessment/Policy/Goals:

- SKAGEN recognises the collective bargaining rights, and this is expressed in our annual report.
- SKAGEN's Ethical Guidelines clearly states our employee rights and responsibilities.
- Our HR track and measure our annual sick leave and is communicated in sustainability report and in our reporting to She Index.
- Since 2020 SKAGEN decided that all cut flowers and coffee to our main office must be FairTrade/certified to avoid violated labour rights.
- We support the Global Compact Principles.
- SKAGEN has selected SDG 8 as one of three main goals to focus on.
- During 2021 SKAGEN will work on a procurement policy specific to SKAGEN.

### Implementation:

- For any grievances any employee might have, there are several ways to make a complaint, including an anonymous statutory notification online form.
- SKAGEN has an Occupational Environment Committee, with two employee elected employee representatives, working to establish and ensure a fully satisfactory working environment in SKAGEN. Employees can approach the employee representatives and anonymously report any misgivings or other whistleblowing concerns.
- SKAGEN has increased its focus on employee physical and mental wellbeing during the covid-19 situation, with virtual sessions on phycological themes as well as online training programmes has been available.
- SKAGEN has a monthly employee survey (anonymous) for monitoring employee satisfaction and other themes. 10 additional mental and physical wellbeing questions have been added.
- SKAGEN has an Ethical Guidelines document, available to all employees

### Measurement of outcomes:

- SKAGEN tracks and monitors gender and diversity demographics annually, including women vs men in management positions which was 40% in the reporting period.
- SKAGEN has committed to report on many gender/diversity data via our signing up to She Index and the local gender equality initiative 50/50.
- Annually the CEO, HR and the Occupational Environment Committee meets and review all cases brought forward, or any other concerns the OEC might have. The minutes are made available to all employees.
- During the last reporting period SKAGEN's main office has changed its cleaning service provider, ensuring that the chosen company has good working conditions, and that all legal requirements are in place.

## **Environment:**

### Assessment/Policy/Goals:

- SKAGEN decided during the last reporting period to track its own greenhouse gas emissions.
- SKAGEN has updated the travel guidelines with an environmental addition.
- SKAGEN will during 2021 increase its efforts on its suppliers, and make sure that those who supply SKAGEN with goods and services do not harm the environment.
- SKAGEN has selected SDG 13 as one of 3 main goals to focus on.
- By becoming a signatory to Global Compact SKAGEN pledges to work actively on Principles 7-9.
- SKAGEN has a Sustainable Investment Policy.

### Implementation:

- SKAGEN has discontinued all use of single use plastic
- SKAGEN has provided support for three persons undertaking education in sustainability to increase knowledge and awareness
- SKAGEN has decreased its use of red meat and will always provide a vegetarian option at events.
- SKAGEN has demanded only eco-certified cleaning products are to be used at main office
- Signed a contract with environmental management system CEMAsys to track our carbon emissions

### Measurements of outcomes:

- The removal of personal wastebins at the main office will result in a decrease of 10 000 plastic bags annually.
- 2019 – 2020 -SKAGEN decreased its Scope 3 emission from Business Travel by 80%, due to Covid.
- Performed a carbon audit for 2019 and 2020, identifying Scope 3 as main GHG emitting factor in SKAGEN.
- The updated travel guidelines will set stricter rules for how often and when an employee in SKAGEN can travel, hereby decreasing our main source of CO2 emissions.

## **Anti-corruption:**

### Assessment/Policy/Goals:

- SKAGEN's Ethical Guidelines outlines the ethical boundaries all employees are subjected to, including the receiving of gifts and other benefits.
- SKAGEN has an Anti-Corruption Policy as a part of the Personnel Handbook plus adheres to the Storebrand Group's Anti-Corruption Policy
- SKAGEN has a gift/benefit declaration form for all gifts and benefits over NOK 500,-
- SKAGEN has signed up to UN Global Compact and therefore pledges to actively work against all forms for corruption.
- SKAGEN is a signatory to UN Principles for Responsible Investment
- In 2021 more work will be put into following up our suppliers on the matter of anti-corruption.

### Implementation:

- All gifts, hospitality, services or other benefits must be reported to the employee's immediate supervisor.
- For gifts over the price of 500NOK an e-mail to [gift@skagenfunds.com](mailto:gift@skagenfunds.com) using a form provided.
- Every employee must undertake mandatory online training in ethics, anti money laundering and anti-corruption.
- Once per year all employees meet to be updated on any new rules and regulations on anti-corruption.
- SKAGEN has increased effort in obtaining id of all clients in our systems.
- SKAGEN shall pay for travel and associated costs when employees attend conferences and similar events.

### Measurement of outcomes:

- Anti-corruption is a part of the annual internal control process.
- The report from the internal control process is verified by an external audit. It commented that some of the courses are only available in Norwegian (Anti-corruption is in English and Norwegian), and therefore a separate form has been given to all non-Norwegian employees to sign, ensuring all employees are familiar with the ethical guidelines in the group.
- Information about the consequences of corruption/bribery is clearly stated annually to employees.
- No incidents relating to anti-corruption occurred during last reporting period.