

# GUIDELINES FOR THE INTEGRATION OF SUSTAINABILITY RISKS IN INVESTMENT DECISIONS

established by the Chief Executive Officer on 5 May 2026

*Info class: Open*

Responsible owner: Handelsbanken Savings and Financing (HP)

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*The guidelines are to be applied throughout the Handelsbanken Group; where applicable, they are also valid for subsidiaries foreign entities, unless binding regulations outside Sweden, or relating to subsidiaries, give rise to deviations. Acceptance and backing for such deviations must be gained from the unit responsible.*

## 1. Objective and applicability

The purpose of these guidelines is to clarify how Handelsbanken integrates sustainability risks into the processes for investment decisions within portfolio management and into investment and insurance advice in terms of financial products and financial instruments. The guidelines do not encompass derivatives.

The guidelines are a supplement to the Central Board's Policy for sustainability and other guidelines established by the Chief Executive Officer relating to sustainability.

## 2. Introduction

A sustainability risk refers to an environmental, social or governance-related event or circumstance which, if it were to occur, would have an actual or potential significant negative impact on the value of an investment. The integration of sustainability risks into the processes for investment decisions within portfolio management and into investment and insurance advice in terms of financial products and financial instruments is a part of ensuring that we act in the best interests of the customer.

## 3. Integration of sustainability risk

Investment decisions within portfolio management and within investment and insurance advice must be preceded by the consideration and management of sustainability risks which may have an actual or potential significant negative impact on the financial value of an investment. The management of such sustainability risks may entail monitoring and engagement dialogue, or the exclusion of investments that do not align with the Bank's policies or stated positions on sustainability. The Bank's assessment must be based on analyses of sustainability data and other relevant information.

### 3.1. Investment decisions

All units within Handelsbanken that make investment decisions within portfolio management must integrate sustainability risks into their investment decisions.

The integration of sustainability risks must be adapted to the specific investment, ensuring that any sustainability risks which may have an actual or potential significant negative impact on the financial value of the investment are considered and managed. Investments in sectors or companies considered to be high risk in terms of sustainability must be identified. These sustainability risks must be managed through monitoring and engagement dialogue with the asset manager or with the company, or alternatively through the exclusion of the investment. The starting point for assessing whether to exclude an investment is Handelsbanken's Policy for sustainability, along with other guidelines established by the Chief Executive Officer relating to sustainability, and the Bank's voluntary commitments.

Asset managers must, at the very least, manage sustainability risks to an equivalent degree as Handelsbanken. As regards investments in companies that violate international norms or conventions concerning the environment, human rights, corruption, and working conditions, the Bank requires that asset managers must take action through engagement dialogue with the company, or exclusion.

For portfolio management, the customer must be informed about how Handelsbanken integrates sustainability risks in its investment decisions.

### 3.2. Investment and insurance advisory services

Sustainability risks must be considered and managed in the context of investment and insurance advisory services.

Assessments of sustainability risks involve a range of factors, depending on the characteristics of the investment. Such factors may include, for example, how the asset manager integrates sustainability risks in investment decisions, or how the individual product owner integrates sustainability risks in investment decisions.

Financial products with holdings in sectors or companies considered to be high risk in terms of sustainability must be identified. This provides supporting documentation for decisions on the potential ongoing management of the sustainability risk. The starting point for the risk management is Handelsbanken's Policy for sustainability, along with other guidelines established by the Chief Executive Officer relating to sustainability, and the Bank's voluntary commitments.

Producers and asset managers of the financial products and financial instruments involved in the advisory services must, at the very least, manage sustainability risks to an equivalent degree as Handelsbanken. As regards investments in companies that violate international norms or conventions concerning the environment, human rights, corruption, and working conditions, the Bank requires that producers and asset managers must take action through exclusion or engagement dialogue with the company.

For investment and insurance advisory services, the customer must be informed about how Handelsbanken integrates sustainability risks in its investment decisions.

Pre-sale information must be unambiguous and transparent, and provide the customer with clear information regarding how sustainability risks are considered in the services for investment and insurance advice.