Coeli Sustainable Investing Policy

Revision date: 2024-10-04

Adoption date: 2024-11-01

Contents

1. Background and objective

As an active and responsible investor and asset manager, Coeli[1] delivers a broad range of investment solutions across public and private markets. Our name Coeli is inspired by Atlas Coeli, the first map of the stars that shows their position with precision while giving a complete picture. With similar precision, we seek to create value for our clients with focused strategies and processes in mind. Our sustainable investing framework takes the same perspective.

For Coeli, sustainability is about perseverance, responsibility, trust, and good business. We care for people, the environment, society, and our world. We attach great importance to thorough analysis in which material environmental, social and governance (ESG) aspects are considered as factors alongside financial factors in a holistic manner in our due diligence and investment processes. We believe this helps us to make better-informed investments, and to prioritize areas where we can contribute to improvements and a positive outcome.

Sustainable investing, however, is not a one-size-fits-all for us. Coeli has a decentralized investment approach and is comprised by independent teams who invest and manage public and private assets across different asset classes and geographies. Hence, our sustainable investing framework contains a *Shared approach* – applied by all investment teams and a *Strategy-specific approach* – applied specifically by each investment team, and a *Sustainable Investing Council* – a forum where our investment teams share knowledge, discuss development, dilemmas, and collaboration, and help build a solid and scalable approach.

2. Definitions

The below definitions as formulated in the Regulation [EU] 2019/2088 of the European Parliament and of the Council on Sustainability-Related Disclosures in the Financial Services Sector apply to the terms used throughout the Sustainable Investing Policy.

Do no Significant Harm	A principle that seeks to ensure that actions that support environmental or social objective do not negatively impact other objectives.
ESG	Environmental, Social and/or Governance
Exclusions	The exclusion of certain sectors, companies, or products from investment portfolios/universe based on established ESG-/ethical criteria.
Principle Adverse Impacts	Negative impacts that investment might have on Sustainability Factors as measured through indicators defined in SFDR.
SFDR	Sustainable Finance Disclosure Regulation: Regulation [EU] 2019/2088 of the European Parliament and of the Council on Sustainability-Related Disclosures in the Financial Services Sector.
Sustainability Factors	Environmental, social, and employee-related matters, respect for human rights, anti-corruption, anti-bribery matters.
Sustainable Investments	An investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.
Sustainability Risks	An environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of an investment.

[1] Coeli Asset Management AB, Coeli European AB, Coeli Frontier Markets AB, Coeli Investment AB, Coeli Wealth Management AB.

3. Application and scope

This Sustainable Investing Policy applies to all investment teams, funds, discretionary mandates, and direct investments in Coeli[1] and scopes the guidelines for our sustainable investing framework containing: Shared approach; Strategy-specific approach; and Sustainable Investing Council.

4. Sustainable investing framework

Coeli's sustainable investing framework contains our Shared approach, each team's Strategy-specific approach, and our Sustainable Investing Council, as described below.

4.1 Shared approach

Our *Shared approach* applies to all our investment teams and contains four parts:

a) ESG integration

b) Stewardship and engagement

c) Investment restrictions and exclusions

d) Reporting and transparency.

a) ESG integration

All investment teams incorporate ESG data and sustainability information into the due diligence and investment process – as appropriate for their strategy and asset class – to identify and manage risks and opportunities in relation to the portfolio and/or underlying holding. Material ESG and sustainability aspects are considered as factors alongside financial factors in a holistic manner to help make better-informed investments, and to help prioritize areas where change, improvements, and a positive outcome can be achieved in the portfolio and/or underlying holding.

All investment teams have access to ESG data and sustainability information which are useful for the specific investment strategy, asset class, due diligence, and ongoing monitoring. The information is leveraged from a variety of sources such as: Company disclosure; engagement with company management or government representatives; third-party research and data; and other publicly available information such as industry data and news.

Each investment team is responsible for assessing the materiality of ESG data and sustainability information as appropriate for their strategy and asset class – including both risks and opportunities, and for acting as stewards of the assets entrusted to us by our clients.

The investment teams are also guided by international standards and principles to assess good governance and identify potential violators of, for example: The UN Global Compact (UNGC); The OECD Guidelines for Multinational Enterprises and Corporate Governance; or The UN Guiding Principles on Business and Human Rights (UNGP).

Specifically, the investment teams consider ESG and sustainability information as signals and indicators of sustainability risks and principal adverse impacts in the portfolio and/or underlying holding:

Sustainability risk

- We recognize that several ESG and sustainability aspects can carry negative consequences and pose actual or potential risks to our investments. Examples of such risks include but are not limited to environmental performance, climate change impact and energy transition, social aspects, supply chain management, corruption and fraud, community impact, governance and economic growth, or access to financing.

- Each team is responsible for establishing and implementing measures within its due diligence procedure and/or investment process, to identify and manage sustainability risks which are material for the portfolios under its management. Details of the measures shall be described in the investment management instruction for each fund and discretionary mandate.

For more information, please see **Annex 1: Integration of Sustainability Risk.**

Principal Adverse Impacts

- We recognize that an unintended consequence of some of our investments may include levels of adverse impact on broader aspects. Examples of such broader aspects include but are not limited to societal and environmental matters, labour and employee matters, respect for human rights, and anti-corruption matters.

- Each team is responsible for establishing and implementing measures within its due diligence procedure and/or investment process, in order identify principal adverse impacts of investment decisions on sustainability factors and seek to address and mitigate them. Details of the measures shall be described in the specific investment management instruction for each fund or discretionary mandate.

- Principal adverse impact of investment decisions on sustainability factors are considered both on entity level and on a product level.

For more information, please see **Annex 2: Principal Adverse Impacts Statement.**

b) Stewardship and engagement

As an active investor and asset manager, our teams are engaged in their investments covering a range of ESG and sustainability aspects that are identified in the due diligence and investment processes. Based on the investment teams' thorough knowledge and understanding, constructive dialogues are initiated with company management, regulators, interest groups, government representatives or peers, seeking to:

- Promote environmental and/or social factors,

- Address and mitigate sustainability risks and principal adverse impacts, and/or

- Contribute to positive development and change.

Each investment team is responsible for establishing their engagement activities, which may come in the form of meetings, formal correspondence, participation at conferences, and exchange of information. Investment teams that invest in publicly listed companies are also able to exercise their ownership power by voting at general meetings.

For more information, please see **Annex 3: Principles for Shareholder Engagement**.

c) Investment restrictions and exclusions

All investment teams adhere to investment restrictions regarding companies involved in weapons restricted under international conventions (i.e., cluster munitions, landmines, chemical and biological weapons, and nuclear weapons).

The investment teams may also exclude companies involved in unaddressed or verified breaches of norms such as the UN Global Compact (UNGC), The OECD Guidelines for Multinational Enterprises and Corporate Governance, or The UN Guiding Principles on Business and Human Rights (UNGP), and where constructive dialogue and engagement activities are assessed not to be fruitful.

Additional investment restrictions or exclusions are applied in our funds based on established ESG-/ ethical criteria set up by each investment team, as described below in our *Strategy-specific approach*.

d) Reporting and transparency

We disclose our sustainable investing framework and provide sustainability-related information for each of our funds on our website. Our reporting complies with the EU regulations on sustainability-related information, which in summary requires transparency regarding:

- Sustainability risk policies (Article 3)
- Adverse sustainability impacts at entity level (Article 4)
- Remuneration policies in relation to the integration of sustainability risks (Article 5)
- Integration of sustainability risks (Article 6)
- Adverse sustainability impacts at financial product level (Article 7)
- Promotion of environmental or social characteristics in pre-contractual disclosures (Article 8)
- Sustainable investments in pre-contractual disclosures (Article 9).

Coeli supports voluntary frameworks and initiatives for responsible investment and responsible business. As a signatory to the Principles for Responsible Investment (PRI) and the UN Global Compact (UNGC), Coeli reports according to these frameworks.

Coeli supports the targets set out in the Paris Agreement, reports our equity funds' carbon footprint and reports according to Net Zero Asset Managers initiative.

Coeli is a member of the Global Impact Investing Network (GIIN).

4.2 Strategy-specific approach

In addition to our *Shared approach*, each investment team applies their *Strategy-specific approach* to sustainable investing relevant to their fund. This may, for example, include:

- A sustainable investment objective
- Themes or specific focus, such as e.g., company sustainability disclosure, Energy Transition, Decarbonization, Gender Equality, Sustainable Development Goals, UN Global Compact principles, and/or
- Promotion of specific environmental and/or social characteristics, and/or
- Specific investment restrictions and exclusion criteria, such as alcohol, arms, fossil fuel, gambling, pornography, or tobacco.

All investment teams are required to describe the details of their *Strategy-specific approach* in the investment management instruction for each fund and discretionary mandate.

4.3 Sustainable Investing Council

Coeli's Sustainable Investing Council consists of the Portfolio Managers from each investment team, the Chief Investment Officer, and the Chief Sustainability Officer. It serves as a forum for coordination and collaboration across our investment teams, while acknowledging each investment team's independence and autonomy.

The Sustainable Investing Council deals with relevant sustainable investing matters, discusses trends, development, dilemmas, and regulations, and agrees on joint voluntary initiatives and cooperation.

The Sustainable Investing Council evaluates Coeli's Sustainable Investing Framework's Shared approach

(ESG integration, Stewardship and Engagement, Investment Restrictions and Exclusions, and Reporting and Transparency) and agrees on suggested changes or adjustments.

5. Conflicts of Interest

Coeli is aware that potential or actual conflicts of interests may arise as part of our investment teams' shareholder engagement activities. Consequently, Coeli has policies in place for the purpose of taking all reasonable steps to prevent conflicts of interests. Where such conflicts cannot be avoided, Coeli will identify, manage, and monitor the conflicts and, where appropriate, disclose them to clients to prevent them from adversely affect the interests of the clients.

6. Follow-up and control

The Policy for Sustainable Investing has been adopted by the board of the Company

The Policy for Sustainable Investing is revised at least annually.

The following monitoring and control functions are set up:

- Coeli's Sustainable Investing Council is responsible for this policy. The Council shall agree on development and suggested revisions of this policy.
- Coeli's investment teams are responsible for establishing and implementing specific investment management instructions for each fund and discretionary mandate under their management. This shall include consideration of sustainability risks, principle adverse impacts, and ESG matters in their investment and decision-making process.
- The CEO of each company is responsible for ensuring that specific investment management instructions have been established by the investment teams within their company. The specific investment management instructions shall be adopted by the CEO.
- The CEO of each company is responsible for ensuring that proper control measures are implemented to ensure compliance with this policy and the specific investment management instructions adopted by the company.
- The independent risk and compliance functions in each company are responsible for monitoring adherence to this policy and the specific investment management instructions of each fund and discretionary mandate.

7. Annex

Annex 1: Integration of Sustainability Risk

Annex 2: Principle Adverse Impact Statement

Annex 3: Principles for Shareholder Engagement

Annex 4: Overview of Coeli's Sustainable Investing approach.

Annex 1: Integration of Sustainability Risk

This information is provided in accordance with Article 3 of Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”).

This statement outlines how Coeli integrates sustainability risk into its investment decision-making processes. Sustainability risk is defined under the SFDR as “*an environmental, social or governance related event or circumstance that, if it occurs, would have an actual or potential significant negative impact on the value of the investment”.*

As outlined in Coeli’s Sustainable Investing Policy, the investment teams consider ESG and sustainability information as signals and indicators of sustainability risks and principal adverse impacts in the portfolio and/or underlying holding.

Coeli recognizes that several ESG and sustainability aspects can carry negative consequences and pose actual or potential risks to our investments. Examples of such risks include but are not limited to environmental performance, climate change impact and energy transition, social aspects, supply chain management, corruption and fraud, community impact, governance and economic growth, or access to financing.

Each team is responsible for establishing and implementing measures within its due diligence procedure and/or investment process, to identify and manage sustainability risks which are material for the portfolios under its management. Details of the measures shall be described in the investment management instruction for each fund and discretionary mandate.

Coeli has access to third-party data and information in support of investment teams’ robust processes to:

- Identify and monitor sustainability risks.
- Manage and mitigate potential sustainability risks.
- Monitor the sustainability risk levels.

Coeli’s sustainable investing framework enables the investment teams to:

- Meet the regulatory requirements related to integration of sustainability risks in the investment process and assess the impact of the investment returns.
- Gain a better understanding of the quality of companies/issuers and how they manage and mitigates risks.
- Make better-informed investment decisions based on a holistic assessment of the investments.
- Meet the demands of clients regarding sustainable investing.

Coeli’s procedures for integrating sustainability risk is embedded in the portfolio management instruction.

Annex 2: Principle Adverse Impact Statement

Principal adverse impact is generally understood to mean the negative impact, caused by an investment decision or investment advice, on these factors. This statement describes how we seek to consider principal adverse impacts (PAI) of our investment decisions on sustainability factors, as per Article 4 of the SFDR.

In case of any inconsistency in translations of this statement, the English version will prevail.

Description of principal adverse sustainability impacts

Several types of economic activity have the potential to impact various sustainability indicators, both positively and adversely. PAI indicators are a way of measuring how issuers negatively impact sustainability factors.

Coeli seeks to manage the risk connected to potential adverse sustainability impact from our investments in several ways, including via screening criteria and assessment of alleged violations of international standards. We monitor and evaluate a range of PAI indicators for investee companies.

The PAI indicators currently monitored and evaluated for investee companies are outlined in below table.

Mandatory PAI Indicator		**Metric**
Climate and other environment-related indicators		
Greenhouse Gas Emissions	GHG emissions	Scope 1 GHG emissions
		Scope 2 GHG emissions
		Scope 3 GHG emissions
		Total GHG emissions
	Carbon footprint	Carbon footprint
	GHG intensity of investee companies	GHG intensity of investee companies
	Exposure to companies in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector
	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources
	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector
Biodiversity	Activities negatively affecting biodiversity- sensitiveanaly areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
Water	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average
Waste	Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average

Social and employee, respect for human rights, anti-corruption, and anti-bribery matters		
Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies
	Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members
	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

Additional PAI Indicators		**Metric**
Climate and other environmental-related indicators	Emissions of air pollutants	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average.
Social and employee matters	Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy.
Anti-corruption and anti-bribery	Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nation convention against Corruption.

For investments in sovereign bonds, Coeli monitors, evaluates, and reports the GHG Intensity.

Description of policies to identify and prioritize principal adverse sustainability impacts

Subject to data availability, Coeli monitors the selected PAI indicators for all managed assets, except for assets where data on PAIs is not available, on an ongoing basis using expert-data provider services. Issuers identified as outliers on specific indicators, or which exhibit high adverse impact across several indicators, are identified based on data acquired from expert-data providers and/or internal analysis. These issuers are subject to further analysis by expert-data providers, and relevant cases will be escalated to our investment teams.

PAI data is also used by some of our investment teams as input into their investment process.

Description of actions to address principal adverse sustainability impacts

Subject to data availability, Coeli monitors the selected PAI indicators for all managed assets, except for assets where data on PAIs is not available, on an ongoing basis using expert-data provider services. Issuers identified as outliers on specific indicators, or which exhibit high adverse impact across several indicators, are identified based on data acquired from expert-data providers and/or internal analysis. These issuers are subject to further analysis by expert-data service providers, and relevant cases will be escalated to our investment teams.

PAI data is also used by some of our investment teams as input into their investment process.

Methodologies and data used to assess each principal adverse impact

ESG integration

Our sustainable investing framework comprises a baseline integration of ESG integration. The ESG integration is implemented across our product range to ensure the portfolio meets a minimum standard irrespective of the individual portfolio's ESG profile. Further, our product range include additional ESG features specified for each product. Depending on the investment strategy, the portfolio could for example exclude certain sectors or securities or invest thematically.

Principle Adverse Impacts monitoring

PAI monitoring is carried out using an expert-data service provider. The issuer's PAI indicator performance is assessed and ranked on their PAI indicator performance, both for individual indicators and overall.

The output of the total assessment and ranking results in a flag indicating the performance of each issuer. The issuers flagged for poor performance, either overall or on individual indicators, are then analysed by our investment teams. For a given indicator, multiple data sources may be used. The indicator importance is prioritized according to parameters reviewed and maintained by our investment teams.

These parameters consider various aspects, including data quality, data freshness and history, data coverage, aspects of the methodology of the data providers, the materiality of the indicator's subject matter, and divergence of indicator values.

The worst performing issuers, or "negative outliers" will be analysed by our investment teams and where relevant escalated to Coeli's Sustainable Investing Council, which will agree and decide on the appropriate action. Cases may also be triggered by internal analysis, based on information/data from other sources.

The range of possible actions consists of the following:

Engagement: The issuer is identified as a candidate for an engagement case. This can be due to various reasons such as the issuer's PAI performance, either overall or on certain indicators, or low data coverage for the issuer compared to benchmark. The investment team engages with a selected issuer and tracks performance after the engagement based on relevant PAI-related KPIs.

Exclusion: The issuer is deemed not eligible for investments and is excluded.

No action: The PAI indicator level of the issuer is deemed acceptable or judged not to reflect the actual ongoing performance of the company, and no further action is needed at this point. The issuer will continue to be assessed on an ongoing basis in deciding the appropriate action, the investment teams consider, among other things, the severity and scope of individual adverse impacts, and the probability of occurrence and severity of adverse impacts, including their potentially irremediable characteristics.

Actions taken or planned in relation to PAI

Coeli has an established framework for sustainable investing including ESG integration, stewardship and engagement, investment restrictions and exclusions, and reporting.

Engagement policy summary

As active investors, our teams are engaged in their investments covering a range of ESG and sustainability aspects that are identified in the due diligence and investment processes. Based on the investment teams' thorough knowledge and understanding, constructive dialogues are initiated with company management, regulators, interest groups, government representatives, or peers, seeking to:

- Promote environmental and/or social factors
- Address and mitigate sustainability risks and principal adverse impacts, and/or
- Contribute to positive development and change.

Each investment team is responsible for establishing their engagement activities, which may come in the form of meetings, formal correspondence, participation at conferences, and exchange of information. Investment teams that invest in publicly listed companies are also able to exercise their ownership power by voting at general meetings.

For more information, please see **Principles for shareholder engagement**.

References to international standards

The application of PAI builds on the UN Sustainable Development Goals (SDGs) and relevant international conventions and norms, including, but not limited to: UN Global Compact; OECD Principles of Corporate Governance; OECD Guidelines for Multinational Enterprises Universal Declaration of Human Rights; UN Guiding Principles on Business and Human Rights; Children's Rights and Business Principles; ILO conventions on labour standards; Rio Declaration on Environment and Development; UN Convention on Corruption; Convention on Cluster Munitions and Paris Agreement under the United Nations Framework Convention on Climate Change.

In relation to the alignment with the Paris Agreement, the application of PAI includes a requirement for investee companies that are active in the most climate-critical sectors to demonstrate a credible transition strategy that is compatible with the Paris Agreement's climate objectives. This includes assessments of their decarbonization pathways as well as their positive contributions to climate mitigation. As the methodologies for assessing this progressively reach greater maturity for a greater number of sectors, the number of companies subject to this requirement will grow.

Additional information

The current expert-data service provider is MSCI ESG.

Annex 3: Principles for Shareholder Engagement

Coeli represents all clients and shareholders who use our services or invest in our funds and discretionary portfolios. In all matters related to our asset management and thereby ownership issues, we act exclusively in the interest of our clients. Since shares are an asset class that can be included in our asset management services, Coeli generally can exercise voting and other rights associated with shareholding on behalf of our clients. Thus, Coeli can have potential influence in a company and thereby influence governance in the direction we believe benefits our clients.

Coeli does not vote for shares in discretionary portfolios, as stated in the engagement agreement.

The purpose of this document is to set out how Coeli, as an asset manager, exercises its shareholder engagement, i.e., how we intend to use voting rights attached to the shares included in the relevant asset management services. This area should not be confused with corporate governance issues, which deal with the division of roles and responsibilities between owners, the board of directors and management.

Exercise of shareholder engagement

Monitoring, dialogue, and escalation

Coeli's investment decisions are generally based on company analyses that consider factors such as the company's business model, market position and development opportunities. The analysis assesses e.g., the company's strategy, financial and non-financial performance and risk, capital structure, environmental and sustainability performance, and corporate governance.

Coeli collects information on the status and planned activities of the companies, obtained through company briefings, investor meetings, capital market days, external analysis, and directly from the companies.

In the ongoing monitoring process, the asset manager assesses the risks that may arise from the investment. The outcome may mean that the asset manager considers that the most appropriate action is to engage in a dialogue directly with the company to influence the company's direction to change in the way that the asset manager believes is in the best interests of clients.

Coeli considers on a case-by-case basis to increase its shareholder engagement; a so-called escalation procedure, which is done by directly contacting the company on material issues, or by exercising voting rights. If the company's response is deemed not satisfactory, the asset manager may also choose to sell the holding.

Coeli is an independent actor but will consider cooperating with other shareholders where this is deemed appropriate and in the common interest of the shareholders.

The Annual General Meeting

The Annual General Meeting (AGM) is the highest decision-making body of the company, where shareholders have the right to exercise their influence by exercising their voting rights. Coeli will normally vote at the annual general meetings of companies where the company has significant fund holdings, and otherwise at meetings deemed essential for other reasons. Participation in annual general meetings is exercised in person, or through voting by proxy in accordance with the voting instructions provided by Coeli. Voting rights shall be used solely for the benefit of the fund and shall be used in the manner deemed to be in the common interest of the shareholders. Any shares lent by Coeli will be recalled in good time before the AGM if Coeli is to participate.

Board of Directors

Coeli shall in cases where board member position would impede effective management, exercise its owner governance without the requirement of having its own board representation.

Nomination committees

Where it is justified or possible based on the volume of shares held to participate in nomination committees, Coeli may decide to participate. Coeli will then work to ensure that each company has a well-composed board in terms of skills, experience, diversity, and gender balance, and will work to ensure that a nomination process is carried out prior to appointment of new members. Coeli will also make efforts to ensure that proposals for new board members are supported by factual arguments, and that the principles by which the nomination committee works are made transparent.

Conflict of interest

Coeli recognizes that potential or actual conflicts of interest may arise as part of our investment teams' shareholder engagement. Coeli has therefore established guidelines to take all reasonable steps to prevent conflicts of interest. If a conflict of interest cannot be avoided, Coeli will identify, manage, and monitor the conflicts and, if necessary, inform the customers about them to prevent them from adversely affecting the customers' interests.

Remuneration to senior executives

Coeli's view is that the remuneration of senior executives of portfolio companies should be market-conforming and aimed at promoting long-term sustainable returns for shareholders. Remuneration programs should contain a clear link between performance and requirements and be reported in the annual report. Proposals for remuneration programs should be discussed with the company's major shareholders well in advance of the AGM.

Communication

The Principles of Shareholder Engagement are subject to annual review. A report on how the principles have been applied will be published annually on the Coeli website: www.coeli.se.

Shareholder Engagement Officer

The person responsible for ownership issues is appointed by the CEO of each company. The shareholder engagement officer shall report annually to the Board on the application of the Coeli Shareholder Engagement Principles.