

Responsible investment policy

Approved by the Board 18 December 2020



ILMARINEN

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This document describes the principles that Ilmarinen takes into account in its investment activities. This Responsible Investment Policy includes three themes: the environment, human rights and ownership.

Ilmarinen's Board of Directors approves this document and the Responsible Investment Executive Committee is in charge of maintaining and updating it.

Person in charge: Karoliina Lindroos, Head of Responsible Investments

Introduction

Responsibility is an integral part of Ilmarinen's investment activities. Ilmarinen's mission is to invest pension assets in a profitable, secure and responsible manner so that we can pay pensions in the future. We are a long-term investor and it is our duty to act in the best interests of our clients and pensioners. As part of this mission, we take into account the environmental, social and governance aspects of investment decisions. We see that taking these aspects into consideration also has an impact on investment returns. We actively manage ESG risks associated with investments and identify investment opportunities to address the

challenges and goals of sustainable development. In addition, we make a positive contribution to promoting responsibility through both our own investments and selected asset managers.

Ilmarinen's investments have a great impact on society. Through our Responsible Investment Policy and the tools available to us, we guide our investment activities to minimise our negative impacts and maximise our positive impacts.

Responsible Investment Tool



One approach to assessing responsibility is to use the Sustainable Development Goals (SDG) defined by the UN. Their purpose is to draw attention to global problems and their root causes, and to encourage the creation of solutions for these challenges. The goals were originally written from a state-level perspective, but many companies and investors have also adopted the goals as guiding factors for their own operations.

SDGs and solution-based business models are part of Ilmarinen's sustainability assessments and targets. Because the goals are interlinked, the right solutions can lead to positive development for more than one goal. The impacts of, for example, climate change are, in many ways, human rights issues and the goals for human rights issues benefit from solutions for mitigating climate change and adapting operations.

We have divided responsibility into three themes (ESG). These themes are the environment (E), social responsibility (S) and good governance (G). Under each theme are the principles that, together with this introduction, form the Responsible Investment Policy. All of principles under each theme can also be read as separate documents.

Despite the differences between the themes, all three are steered by three main requirements:

- Compliance with international norms
- Active ownership/dialogue
- Integrating ESG analysis into investment decisions

Compliance with international norms and exclusion of investments

National legislation is not always strong enough from a responsibility perspective, which is why we insist that our investees also comply with international norms. We expect the companies we invest in to comply with the principles of the UN Global Compact and the UN declarations on human rights, the environment and corruption and the ILO's Declaration on Fundamental Principles and Rights at Work. Based on our experience, greater benefits can be achieved

through engagement processes than exclusion. However, we exclude from our investment universe companies that have breached international norms, if engagement processes are not successful. We also do not make direct investments in companies that are dependent on coal or manufacture tobacco products or weapons prohibited by international agreements. More details about exclusions and how the principles are taken into account in investment decisions can be found in the Responsible Investment Guidelines.

[Ilmarinen's Responsible Investment Guidelines](#)

In addition to our own continuous monitoring, our external co-operation partner regularly reviews our securities investments and reports any suspected or detected norm violations. We take into account known norm violations when making investment decisions and systematically monitor new suspected violations. An engagement process is our primary means of ending the undesirable activity. If engagement is not successful, we will exit from the investment where possible.

In our investment activities, we take into account the resolutions of the Financial Action Task Force (FATF) on international obligations to combat money laundering and terrorism financing and the UN's and the EU's economic sanctions.

Active ownership

Active ownership is an integral part of Ilmarinen's investment activities. Through active ownership and dialogue we have the opportunity to engage with our investees and highlight ESG-related risks and opportunities. We actively hold discussions with our investee companies with the goal of improving sustainability and addressing controversies. If an investee, for example, fails to comply with international norms, we will deepen our dialogue into an engagement process that aims at ending the undesirable activity and the adoption of responsible procedures. If the undesirable activity does not end as a result of the engagement process, our last resort is to exit from our ownership in the company where possible. An engagement process is

not a purely reactive approach. We also engage proactively to increase our understanding and reduce investment risks. We can carry out the engagement process both alone and together with our service provider and other investors, and through investor initiatives. More detailed definitions of engagement and how the principles are taken into account in investment decisions can be found in the Responsible Investment Guidelines.

[Ilmarinen's Responsible Investment Guidelines](#)

Integrating ESG analysis into investment decisions

Environmental and social impacts and governance issues influence companies' profitability, costs and reputation. They are therefore also relevant to the investor's return and risks. Because ESG issues are relevant to the financial success of our investees, it is important for us that the persons in charge of making investment decisions participate in the analysis and identification of ESG factors. As part of the investee investigation process, we use ESG indices, ratings and classifications and expert internal and external analysis. More detailed definitions of the integration and how the principles are taken into account in investment decisions can be found in the Responsible Investment Guidelines.

[Ilmarinen's Responsible Investment Guidelines](#)

Approval of the policy and guidelines

Ilmarinen's Responsible Investment Policy is approved by Ilmarinen's Board of Directors. Drawing up and updating this policy and providing practical guidance are the responsibility of Ilmarinen's Responsible Investment Executive Committee, which consists of the President and CEO, the Chief Investment Officer and representatives of the Investment division, Legal Affairs and Communications. Ilmarinen's investment organisation is in charge of implementing the policy.

Reporting

Openness is one of Ilmarinen's values and it also relates to reporting on our investment operations. We report extensively on our investment operations as part of Ilmarinen's other reporting. In accordance with the UN's Principles for Responsible Investment (PRI), we publish an annual PRI report on our responsible investment activities. We also report on responsible investments as part of Ilmarinen's Sustainability Report. In addition to our own reporting, we supply information on our investment operations for the surveys and comparisons of different stakeholders whenever possible. More detailed information about the Responsible Investment Policy's practical measures and targets is provided in Ilmarinen's sustainability reports and PRI reports.

[Ilmarinen's PRI Reports](#)

[Ilmarinen's Sustainability Report](#)

” A company that is mindful of the environment and its stakeholders also achieves long-term financial success.

Environmental Policy

The environment plays a significant role in our health and well-being. That is why it is natural that the environment is one of the key themes of our sustainability work. In our investment operations, the environment means the built environment, cultural environment and natural environment.

Basic assumptions about the impacts of environmental issues on investments

In our view:

- Environmental and land use issues will alter how the economy and companies operate in the coming years. These areas involve business and investment opportunities, such as eco-friendly technology and property development.
- Environmental issues are a significant fi-

financial risk also for investment operations that could be realised, for instance, when demands set in legislation increase companies' expenses, investors begin avoiding certain companies or sectors on the basis of estimated environmental risks and/or when companies' operating environments change.

We are a major developer and real estate investor, which means that taking the entire life cycle of a building into account is important to us. The buildings we have developed are made to last and adapt to their users' needs. The basic assumption and minimum requirement is that our investees comply with national legislation and international norms related to the environment.

In addition to our own continuous monitoring, our service provider regularly reviews our securities investments and reports any suspected or detected norm violations. We take into account known norm violations when making investment decisions and systematically monitor new suspected violations. If our investee company has difficulties complying with this policy, an engagement process is our primary means of ending the undesirable activity. If the engagement process does not achieve the desired result, we will exit from the investment where possible.

We also value transparent, up-to-date and comparable reporting by our investees on environmental factors, including those critical to climate change. The environment encompasses much more than just the climate. However, at this stage, we have concentrated a large part of our environmental work on climate change. An example of this is the separate Climate Policy with the related goals.

More detailed requirements and goals are provided in the guidelines, which are the responsibility of Ilmarinen's Responsible Investment Executive Committee.

[Ilmarinen's Responsible Investment Guidelines](#)

Climate Policy

Climate change is a major global threat which can escalate into a crisis if society's various players do not take action. Reducing

emissions cannot be a voluntary measure; it is a prerequisite for sustained societal stability. Despite the challenges it brings, climate change also entails significant new business opportunities. Ilmarinen is a global investor, and our investments make an impact around the world. That is why we must take climate change into account in a systematic, forward-looking manner. By incorporating climate factors into our investment decisions, we can participate in building a successful future based on a sustainable and just transition and promote the goals of our investment activities.

» Climate change is a significant financial risk and opportunity in investment operations.

Basic assumptions about the impacts of climate change on investments

In our view:

- Climate change has changed and will change how the economy and companies operate in future.
- The concrete impacts of climate change will weaken companies' business opportunities in the form of, for example, extreme weather conditions.
- High emission reduction targets give rise to new business and investment opportunities relating to, for example, low-carbon technology and climate change mitigation and adaptation.
- Climate change causes significant changes in the value of investments.
- Climate change creates sustainable growth opportunities in the transition towards low-carbon economy.

We continuously update our understanding of the risks related to climate change in our investment activities. We do this mainly via various analyses, by training key personnel, and by holding discussions with representatives of our investees, customers and co-operation partners.

Climate targets of investment activities

Our long-term goal is to achieve carbon neutrality for our entire portfolio by the end of 2035. This is consistent with Finland's carbon neutrality 2035 goal. As a global investor, we are also aware that not all countries have goals as ambitious as ours. We expect many other countries to set targets and all of them to take action to reach them. Without government action, we will not be able to achieve our carbon neutrality goal.

Ilmarinen's Responsible Investment Executive Committee approves the practical implementation, guidelines and target levels linked to the Climate Policy for reaching the longer-term goal.

Climate principles in engagement with stakeholders

We actively participate in societal dialogue. We support development, including collaborative development that promotes climate change mitigation and adaptation. We also support the implementation of appropriate means in legislation and in making use of business opportunities, and appropriate shareholder proposals.

Transparency principles in reporting

Openness is one of Ilmarinen's values and it also relates to reporting on the climate impacts of our investment operations. As part of Ilmarinen's other reporting, we report on our climate impacts, including our climate targets and relevant climate-related topics, risks and opportunities.

Human Rights Policy

Companies require a social licence to operate in order to achieve long-term success. Human rights are an integral part of responsible business.

Adherence to human rights is important to Ilmarinen and is thus also included in investment operations. Human rights are defined based on international agreements and declarations, for example the UN's Universal Declaration of Human Rights. These rights apply equally to all regardless of age, gender, religion, ethnicity or wealth. Rights concerning working life and children are separately defined in agreements and declarations specifically related to these topics. Ilmarinen's Human Rights Policy outlines how human rights are taken into account in our investment decisions, while the practical guidelines describe how the policy impacts practical portfolio management.

Human rights principles in investment operations

The basic assumption and minimum requirement is that our investees comply with human rights and the rights of children in addition to core labour standards. Children's rights are not simply about preventing the use of child labour, but also about taking children's rights into account, for example, in product safety, land use issues and in advertising and marketing. Companies should have a comprehensive view of human rights and see them as a key component of corporate responsibility.

In addition to our own continuous monitoring, our external co-operation partner regularly reviews our securities investments and reports any suspected or detected norm violations. We take into account known norm violations when making investment decisions and systematically monitor new suspected violations. If our investee company has difficulties complying with this policy, an engagement process is our primary means

of ending the undesirable activity. If the engagement process does not achieve the desired result, we will exit from the investment where possible

Basic assumptions about the impacts of human rights on investments

In our view:

- Human rights and compliance with them are an essential part of all business.
- A company that is responsible and profitable in the long term takes care of its personnel, customers and other stakeholders in a way that supports business.
- A company that is indifferent to human rights presents a growing financial risk to investment operations, for example through changes in legislation or regulations and avoidance by customers, other stakeholders or investors.
- By taking care of its personnel's well-being, a company shows that it seeks to create long-term value.
- Projects related to well-being at work and occupational safety boost both financial benefits and the company's positive social capital.

Human rights principles in engagement with stakeholders

We actively participate in societal dialogue. Our goal is to support development that promotes the integration of human rights into all business operations.

Transparency principles in reporting

Openness is one of Ilmarinen's values and it also relates to reporting on the human rights impacts of our investment operations. We do not have a reporting framework and indicators for human rights comparable to the Climate Policy. We also highlight human rights impacts, in particular through the engagement process, in our other reporting.

Ownership Policy

” The owner has the power and the responsibility to implement ownership. It can bring about positive change.

Ownership is a key part of Ilmarinen's investment activities. We are an active owner and impact the companies we own in various ways. The focus of active ownership is on domestic ownership and direct impact, which we accomplish through, among other things, nomination committees, voting at general meetings and regular communications with corporate management. In the case of indirect ownership, fund management companies are responsible for active ownership. We regularly ask them about the implementation of active ownership, whether in writing or in meetings.

In addition to this policy, Ilmarinen has public ownership guidelines, approved by Ilmarinen's Responsible Investment Executive Committee, which include more detailed insight into, for example, changes in the capital structure and Board elections.

The policy applies to our investments in both Finnish and foreign companies. Ilmarinen expects the publicly quoted companies it owns to follow local corporate governance codes and international recommendations for good governance. In Finland, we expect publicly quoted companies to follow the Securities Market Association's Finnish Corporate Governance Code in force at any given time. It is important in our view that companies present clear justifications for any non-compliance with local corporate governance codes. We expect companies other than publicly quoted companies to follow local corporate governance codes and international good governance recommendations where applicable and if possible considering the operating environment and the company's size and position. For the purposes of this policy, publicly quoted companies are taken to mean companies traded on

a regulated market. In Finland, this means companies traded on Nasdaq Helsinki (Helsinki stock exchange). For the purposes of this policy, listed companies are taken to mean companies traded both on a regulated market and in a multilateral trading facility. In Finland, this means companies traded on Nasdaq Helsinki (Helsinki stock exchange) and in First North Growth Market Finland (First North).

Different markets have their own corporate governance codes, legislation and local practices when it comes to ownership. These local guidelines may be mutually conflicting and companies may face challenges in fully following Ilmarinen's policies in addition to the other requirements. Different practices and legislation exist for the handling and approval of, for example, remuneration plans, depending on the marketplace. In these situations, it may be appropriate to look at the whole picture rather than the differences in the smaller details.

As required by law, we annually report on our website on how the Ownership Policy has been implemented. Additionally, we report extensively on our investment operations and our responsibility work as part of the Financial Statements, Report on Operations and the Sustainability Report, for example.

Ownership and investment strategy

The objective of pension insurance companies' investment operations is to sustainably secure the financing of the earnings-related pension system in the long term. Ilmarinen's investments are long-term in nature and the goal is to maximise the value of the investments in the long run. We hold high expectations concerning the good governance and responsible business operations of the companies we invest in. Ilmarinen believes that responsible operations lower the equity and debt capital costs of companies and, subsequently, taking sustainability aspects into account becomes part of the risk management of investments and investment operations. By engaging with the governance of

the companies we own, we can help promote solid long-term performance.

Significance of earnings-related pension assets and Finnish ownership

The profitable investment of pension assets secures the sustainable financing of pensions and is thus an integral component of the Finnish social security system. Ilmarinen is an important owner in Finnish listed companies and a significant economic operator in Finnish society at large.

Around one quarter of our investment assets are invested in Finland, directly benefiting Finnish business and industry. The success of Finnish companies impacts our return on investment and work carried out in Finland is directly linked to Ilmarinen's pension contribution accrual.

Due to smaller relative holdings, our opportunities to engage with foreign investees on our own are usually much more limited

Monitoring the operations of the companies we own

Ilmarinen monitors the operations of the companies it owns through various methods, including through meetings and reporting. The operations of a company in which Ilmarinen invests must be sufficiently transparent and it must provide information on, for example, its financial performance, strategy and risk assessment.

Open, regular and comprehensive reporting by the investees on their operations is important to us. In addition to financial reporting, companies must report on their governance and sustainability principles, their application and the related objectives. We also consider it important that companies include their tax policies and tax footprints, diversity policy and the carbon footprint and other environmental impacts of their operations in their other reporting. A good practice is for the reported sustainability data to be verified by an independent party, taking into

account the size and resources of the companies, however.

Use of ownership rights in investee companies

Participating in the work of Boards of Directors

Ilmarinen's "Governing body memberships and secondary occupations" instructions specify the terms under which Ilmarinen employees can act as members of the governing bodies of other companies and foundations. Ilmarinen's Board of Directors approves any and all memberships of Ilmarinen employees in the governing bodies of listed companies. In addition, the Board of Directors approves all other memberships of the President and CEO and the members of the Executive Group in the governing bodies of corporations outside of Ilmarinen. The President and CEO approves all work-related memberships of other personnel in the governing bodies of non-listed companies.

When carrying out the evaluation, the person making the decision shall take into account the independence requirements for pension insurance companies, the appropriateness of the membership and the best interests of the pension insurance company. Furthermore, the membership may not cause any conflicts of interest, have a negative impact on decision-making regarding investments or interfere with the carrying out of the person's basic tasks at Ilmarinen. The board memberships of Ilmarinen employees are listed on Ilmarinen's website.

[Ilmarinen's instructions concerning governing body memberships and secondary occupations](#)

[Ilmarinen's board memberships](#)

Participating and engaging in the process of nominating Board members

The Board of Directors' task is to promote the best interests of the company and its shareholders. In order to improve the efficiency of electing a Board of Directors in publicly quoted companies and large

non-listed companies, a body is required to prepare nominations. This body can contain both members of the Board and shareholder representatives. Ilmarinen actively participates in the selection of Board members via the nomination process. Ilmarinen promotes professional governance and management of the companies it owns.

Ilmarinen advocates the setting up of a Shareholders' Nomination Committee whose members should be elected from among representatives of the largest owners. In companies with a diversified ownership structure it may be warranted to have a Nomination Committee that is made up of Board members. In the latter case as well, Ilmarinen considers it to be good practice for the largest shareholders to be consulted in advance, when necessary, concerning possible changes in the composition of the Board.

General meeting notice and matters to be discussed at the general meeting

Ilmarinen considers it important for any extraordinary motions to be explained in detail in the notice of meeting. At the general meeting, the company's governing bodies' remuneration policy and report should be presented to the shareholders concisely and clearly, in accordance with the Governance Code. Furthermore, a presentation of the tax policy and tax footprint is desirable.

Composition of a Board of Directors

When selecting Board members, Ilmarinen values competence, experience and complementary expertise. The diversity of the Board supports the company's business and its development. The diverse composition of the Board of Directors also entails that the Board's members should consist of both genders. The composition of the Board of Directors and the number of members must be in line with the industry-specific structure and with the life-cycle stage of the company in question. The Board must have sufficient expertise without having to unnecessarily increase the number of Board members.

Board members should have sufficient

time to perform their duties satisfactorily. Persons with too many simultaneous board memberships should thus not be elected to the Board. As a rule, the President and CEO of a publicly quoted company may hold no more than two other seats on the boards of other publicly quoted companies, of which at most one can be as chairman. Furthermore, it is important to pay attention to the independence of members when electing the Board. The basis for evaluating independence is, for example in Finland, the Corporate Governance Code for listed companies. The majority of the Board must be, as a rule, independent of the company and at least two members of the Board must be independent of both the company and the company's major shareholders. The results of the independence assessment of new Board members should be published as part of the presentation of the persons standing for election.

It is important that the functions of the Chairman of the Board and the President and CEO are clearly separate. The President and CEO reports to the Board of Directors concerning operating activities, which the Board supervises. The Board of Directors is responsible for the company's strategic policies. As a rule, the President and CEO should not be a member of the Board of Directors of the company he/she is in charge of.

We consider it to be important for the Board's members to own shares in the company. Through share ownership, the goals of the Board members and shareholders can be aligned and harmonised.

Remuneration

According to Ilmarinen, competitive remuneration is an important tool for attracting skilled executives to a company. Well-managed remuneration plans encourage the management to increase the value of the company in the long term. A good remuneration plan is characterised by a long-term perspective, clarity, simplicity and by only rewarding success that has been earned. We consider it good practice for a company to compare its success with peers in the same sector and to report the structure of the peer

group it uses. A company should strive for maximum transparency in its remuneration plans.

For Ilmarinen, it is important that both a company's operative management and Board of Directors own shares in the company. Ilmarinen is in favour of management remuneration plans that help to align a company's management goals with those of its shareholders. The remuneration of a member of the Board from outside the company must be arranged separately from the remuneration of the management. As a rule, the inclusion of a member of the Board in the same share-based remuneration plan is not well-founded because it can weaken the implementation of the duty of surveillance and cause conflicts of interest. In Ilmarinen's view, it is important for sustainability issues to be taken into consideration in the remuneration plans where applicable, in addition to financial viewpoints.

The compensation paid to the members of the Board should be proportionate to the difficulty of the work and the time used. The amount of work of the chairman of an Audit Committee and its difficulty should be taken into account when determining the compensation. The compensation may consist of an annual remuneration, meeting fees or a combination of the two.

Making decisions concerning the details of remuneration and compensation plans for the management is one of the tasks of a company's Board of Directors. The Board of Directors decides on the remuneration and other compensation paid to the President and CEO and possible deputy CEO within the framework of the remuneration policy presented at the general meeting. Ilmarinen believes that the Boards of publicly quoted companies should have a separate Remuneration Committee. A company's management should not take part in drawing up remuneration plans pertaining to itself.

A company's management bears the primary responsibility for drawing up a remuneration plan for the rest of the personnel and ensuring that the plan is not in conflict with the owners' interests.

Changes in the capital structure

Ilmarinen considers it important that the authorisations proposed by a Board of Directors concerning the issuance of new shares are appropriate considering the company's strategy and life cycle. We consider it to be a good thing for the share issue authorisation used for remuneration is separate from a so-called general share issue authorisation so that shareholders are able to assess the purposes and appropriateness of the authorisations.

Dividend policy

The dividend-paying capacity of a company depends on its financial performance, capital structure and growth prospects. Ilmarinen considers it important for a company to have a dividend policy approved by the Board and that the dividend policy is, from the shareholders' perspective, active and goal-oriented, and secures the company's solvency.

Share series and voting rights

In Ilmarinen's view, the best model is one in which one share corresponds with one vote at general meetings. Ilmarinen generally considers various voting right restrictions and approval clauses as factors that reduce a company's value.

Shareholder proposals to general meetings for improving sustainability

As a rule, we take a positive view of shareholder proposals to General Meetings that promote sustainability in accordance with the policy followed at Ilmarinen. We can co-file for example shareholder proposals related to climate impacts and support similar relevant and purposeful proposals filed by other shareholders. Our decisions on whether to support a proposal or not are impacted by how relevant they are in terms of a company's business and its impacts, how the company has acted in the matter compared to its peers and the company's voting recommendation and its grounds. We support, for example, proposals to general meetings that support the key objective of Ilmarinen's Cli-

mate Policy: that companies should assess their strategic choices and investments in terms of mitigating global warming.

Participating and exercising voting rights at General Meetings

Ilmarinen attends the annual and extraordinary general meetings of the companies in which it is a major owner or where participation is otherwise deemed appropriate, for instance due to a theme on the agenda.

If the proposals presented by the Board of Directors to the general meeting differ from our policy, we will primarily hold discussions with the company in question before the general meeting in order to reconcile the viewpoints. If the discussion is not possible or does not lead to an understanding, we will use our ownership rights in connection with any voting. Our goal is to ensure that the company knows the basics of voting conduct in cases in which we do not support the Board of Directors' proposal.

If necessary, Ilmarinen will file proposals as a shareholder for improving good governance and responsibility and support similar proposals by other shareholders and participate in preparing them.

Ilmarinen publishes on its website its votes at the general meetings of publicly quoted companies.

[Ilmarinen's votes at general meetings](#)

Dialogue with the companies we own, other shareholders and stakeholders

Communication with companies outside general meetings

Ilmarinen holds discussions with the management and, if need be, the Board of Directors of the companies it owns as part of normal portfolio management. We review the companies' business and financial position in the discussions. The aim is also to promote the companies' sustainability, particularly their adherence to the principles of the UN Global Compact and the UN declarations on human rights, the environment and corruption and the ILO's Declaration on Fundamental

Principles and Rights at Work. In Ilmarinen's view, it is important for the strategies of the companies we own to widely incorporate business relevant ESG issues.

Communication with other shareholders and stakeholders

As a general rule, communication with other shareholders in individual companies is limited to nomination committee work or engagement processes. If necessary, we co-operate with other shareholders in order to engage on controversies. In particular with foreign holdings, it is effective to work together with other shareholders. If the undesirable activity does not end as a result of the engagement process, our last resort is to exit from our ownership where possible. Due to possible market reactions, we cannot normally comment on our investment decisions. We are happy to engage in discussions with different stakeholders especially on the topic of sustainability.

Tax policy

Ilmarinen's principles related to taxation of our investment activities and Ilmarinen's responsible tax policy derived from these principles are part of Ilmarinen's Responsible Investment Policy. The responsible tax policy contributes to the societal impact of our operations and the transparency of Ilmarinen's investment activities.

Within Ilmarinen's investment activities, the responsible tax policy means

- commitment to comply with the tax laws and regulations of Finland and other investment jurisdictions;
- expectation that our counterparts commit similarly to comply with the tax laws and regulations of investment jurisdictions;
- reviewing, prior to the investment decision, the tax treatment of investments and investment structures in the context of unlisted investments;
- conducting the investment activities from the business viewpoint, independent of taxation; and
- open interaction with tax authorities and other relevant stakeholders in order to de-

termine and meet the statutory reporting obligations.

Ilmarinen does not take part in aggressive tax planning in its investment activities.

Further, Ilmarinen does not make investments through investment structures the purpose of which is to avoid reporting obligations related to the exchange of information between jurisdictions; or whose purpose is to prevent tax authorities from identifying the beneficial owner of investment returns.

Ilmarinen's statutory mission is to invest pension assets in a profitable, secure and responsible manner so that we can pay the pensions of persons covered by pension insurance in the future. Ilmarinen also takes the interest of persons covered by pension insurance into account from a tax point of view; and therefore strives to make its investments, where possible, without being exposed to international double taxation which is contrary to the principles of international taxation.