

## Information on the Implementation of Active Ownership Policies 2024

Fondsmæglerselskabet Maj Invest A/S (“Maj Invest”) is a MIFID investment firm primarily engaged in portfolio management and offering investment advice to clients without providing custodial services. Any investments made by Maj Invest on behalf of clients are always registered and deposited with the clients’ custodian. Thus, Maj Invest is not an “intermediary” as defined in EU-directive 2017/828 of 17 May 2017 Shareholder Rights Directive II (“SRD II”), art. 2(d), as also implemented into Danish regulation, and is therefore not covered by obligations for these entities including facilitation of the exercise of shareholder rights.

In accordance with SRD II, Article 3g(1)(b) and (2), and as implemented in the Danish Act on Investment Firms, Investment Services, and Activities (FIA § 49), Maj Invest qualifies as an “asset manager” (as defined in SRD II, Article 2(f) and implemented into Danish regulation). As such, Maj Invest is obligated to develop and publicly disclose an engagement policy. This includes detailing how the policy has been implemented, providing a general description of voting behavior, explaining the most significant votes, disclosing the use of proxy advisors, and reporting on how Maj Invest has cast votes at general meetings of companies in which it holds shares.

Maj Invest has published a Voting Policy and a Responsible Investment Policy on its website, outlining its approach to active ownership practices. These policies apply to Investeringssforeningen Maj Invest, Maj Invest Funds, Maj Invest Global Value Equities Fund, LP, Maj Invest Global Value Equities CIT, as well as other selected discretionary mandates. For discretionary mandates, clients may have specific legal or governance requirements, resulting in tailored voting setups or additional requirements.

### Implementation of policy

Maj Invest’s approach to the exercise of voting rights for clients depends on and is in accordance with the agreement with the client in question. Agreements with clients are individual and not necessarily identical. The voting approach thus may include the following scenarios:

- **Discretionary Voting:** In some cases, Maj Invest has the discretion to vote on behalf of the client

- **Mandatory Voting:** In other cases, Maj Invest is obligated to vote in accordance with client instruction.
- **No Voting:** Certain agreements explicitly exclude voting on behalf of the client.

As a result, Maj Invest evaluates voting decisions on a case-by-case basis, ensuring alignment with client agreements and interests.

During the year, Maj Invest conducted voting activities in accordance with its Voting Policy. Discretionary voting was applied for all clients where this was agreed upon. For these clients, voting rights were exercised at 95% of all general meetings during 2024, which is deemed satisfactory. Additionally, the implementation of the Active Ownership Policy resulted in Maj Invest voting against management at 36% of the votable proposals.

For Investeringsforeningen Maj Invest, a non-voting approach was taken due to its separate voting policy, which required Maj Invest to vote only on matters of significant economic relevance—none of which arose in 2024. However, this policy was aligned with Maj Invest's Active Ownership Policy during 2024, and Maj Invest will begin exercising voting rights on behalf of Investeringsforeningen Maj Invest starting in 2025.

Maj Invest also conducted engagement activities in accordance with its Responsible Investment Policy. The Maj Invest Danish Equities Team engaged in several dialogues with companies on environmental, social, and governance (ESG) topics. In total, the team held 28 dialogues with companies within its investment universe. These engagements typically addressed less severe cases related to strategic adjustments or potential concerns about specific activities that posed risks to the portfolio.

Additionally, Maj Invest engaged with companies through the third-party data provider Sustainalytics. Sustainalytics initiates engagement with companies that breach or are at risk of breaching international norms, such as the UN Global Compact or OECD Guidelines. Sustainalytics assesses the measures taken by these companies to address the identified issues. If the engagement process does not result in meaningful behavioral changes, the company is placed on Sustainalytics' Disengage List, and Maj Invest may subsequently divest from the investment. During 2024, Sustainalytics engaged with 28 companies on 33 cases on behalf of Maj Invest.

#### Use of proxy advisors

Maj Invest utilizes the analysis firm ISS Governance for managing and executing voting activities. The ISS platform is used to monitor meetings and review research to ensure that voting aligns with Maj Invest's Voting Policy.

For discretionary voting activities, Maj Invest reviews proxy voting recommendations provided by ISS Governance. If ISS recommendations do not align with management's proposals, the investment teams make the final decision. All potential conflicts of interest were assessed, and no conflicts were identified during the year.

### Significant votes

Maj Invest has established its own criteria for determining which votes are deemed significant. These criteria are based on the subject of the vote as well as the size of the capital share in the respective companies. The focus is on votes in companies where:

- Maj Invest owns more than 2% of the share capital.
- A single stock represents more than 5% of the portfolio's market value.

#### *2024 - Maj Invest Holdings Over 2%*

Company	Ownership share	Vote cast	Votes against management	Comment
MT Hoejgaard Holding A/S	4,7%	No	NA	Company subject to a non-voting strategy
Greenland Resources Inc	2,6%	No	NA	Company subject to a non-voting strategy

#### *2024 - Stocks Over 5% of Portfolio*

Company	Portfolio weight	Vote cast	Votes against management	Comment
DSV A/S	10,34	No	NA	Company subject to a non-voting strategy
Taiwan Semiconductor Manufac. Co. Ltd.	10,1	No	NA	Company subject to a non-voting strategy
Novo Nordisk A/S	8,89	No	NA	Company subject to a non-voting strategy
Pandora A/S	8,84	No	NA	Company subject to a non-voting strategy
Melrose Industries PLC	8,62	No	NA	Company subject to a non-voting strategy
Danske Bank A/S	7,98	No	NA	Company subject to a non-voting strategy
Mastercard Inc	7,75	No	NA	Company subject to a non-voting strategy

Schibsted ASA	7,09	No	NA	Company subject to a non-voting strategy
Alphabet Inc	6,52	Yes	Yes	Vote <b>FOR</b> the Report on Climate Risk in Retirement Plan Options was cast to enhance employee understanding of retirement plans, support climate commitments, and aid shareholder risk evaluation.
Samsung Electronics	6,11	No	NA	Votes were cast with management, and no significant issues were addressed at the AGM.
Demant A/S	5,95	No	NA	Company subject to a non-voting strategy
Moody's Corp	5,94	No	NA	Company subject to a non-voting strategy
Lowe's Cos Inc	5,86	No	NA	Vote <b>AGAINST</b> ratifying Deloitte & Touche LLP as auditors due to their tenure exceeding seven years.
American Express Co	5,86	No	NA	Vote <b>FOR</b> reporting on climate lobbying. Increased disclosure would help shareholders assess potential misalignments between the company's lobbying activities and its net-zero commitment..
Koninklijke Ahold Delhaize NV	5,85	No	NA	Votes were cast with management, and no significant issues were addressed at the AGM.
Tryg A/S	5,84	No	NA	Company subject to a non-voting strategy
Berkshire Hathaway Inc	5,67	No	NA	Vote <b>FOR</b> establishing an Environmental/Social Issue Board Committee. A dedicated Railroad Safety Committee would enhance oversight of safety policies, strengthen risk management, and demonstrate commitment to ethical business practices. This measure supports long-term value, workforce protection, and community safety.
SoftBank Group Corp	5,52	Yes	No	Votes were cast with management, and no significant issues were addressed at the AGM.
NKT A/S	5,37	No	NA	Company subject to a non-voting strategy

China Construction Bank Corp	5,36	No	NA	Company subject to a non-voting strategy
Novonosis A/S	5,16	No	NA	Company subject to a non-voting strategy
AutoZone Inc	5,12	No	NA	Vote <b>AGAINST</b> 4 out of 8 directors due to the lack of a majority-independent board.
Qualcomm Inc.	5,08	No	NA	Company subject to a non-voting strategy

#### Client access to voting information

Maj Invest is committed to transparency and has published. Proxy voting statistics will be included in the Maj Invest Asset Management ESG Report, scheduled for publication in Q2 2025.

Furthermore, Maj Invest offers clients the opportunity to request additional information regarding voting activities conducted on their behalf. Clients wishing to obtain such information may contact Maj Invest at [legalcompliance@majinvest.com](mailto:legalcompliance@majinvest.com) or reach out to their designated client manager.