

Diversity Policy for Formuepleje-Group

This document is a translation of the Danish Diversity policy.
In case of any reasonable doubt, the authentic Danish text shall prevail

1. General information about the Diversity Policy

- 1.1 This policy (the "Diversity Policy") defines and sets out the Formuepleje Group's guidelines for motivating sufficient diversity of qualifications and skills among members of the board of directors. The Diversity Policy is authorised by section 70(1)(iv) of the Danish Financial Business Act (the "Act"). In Formuepleje-companies that have set up a nomination committee a duty to determine a diversity policy rests on the nomination committee. In the diversity policy a reference to the board of directors will occur whereas the board of directors for each group company or the nomination committee where relevance.
- 1.2 The Group comprises the financial companies in the Formuepleje Group. Reference is made to Appendix 1, which is regularly updated and when needed by the Executive Board. In the present Diversity Policy, the financial companies are referred to separately as "Group company", and together as "Group companies".
- 1.3 The boards of directors of the Group Companies believe the Diversity Policy is in compliance with current legislation.

2. Purpose

- 2.1 The purpose of the policy is to promote diversity on the boards of the Group Companies, hereinunder diversity in qualifications and competences among the members of the board of directors. Likewise, this is essential when recruiting new board members. Diversity is defined as variety in qualifications, skills and background, including factors such as experience, gender and education and training.
- 2.2 The general purpose of the board is to ensure a board composition that enables the board to perform its strategic, managerial and control tasks. The principal tasks of the board is to ensure that the board, overall, possesses adequate knowledge, professional skills and experience to discharge its duties.

3. Skills requirements on the board

- 3.1 It is essential that the board is composed in a way so as to ensure effective performance of its tasks in a constructive and qualified dialogue with the executive management. It is also essential that the members of the board always act independently of special interests.
- 3.2 Together, the members of the board must possess the skills and experience required to manage the individual group company, including having an understanding of the business and the most important risks associated with the group company.
- 3.3 The board has identified the following qualifications and skills the board requires the group of board members to have:
 - Knowledge of financial regulation, including insights into the organisation of investment services companies, investment management companies/managers and regulatory matters applying to UCITS and AIF.
 - Management experience. At least one member of the board should have management experience from a financial undertaking
 - Other board experience
 - Financial insights, including insights into accounting matters
 - Market insights
 - Insights into product types
 - Commercial awareness
 - Common skills, including insights into society, business matters in general and at industry level

4. Specific targets and measures

- 4.1 In connection with the annual general meeting and the election of board members, an assessment must be made of whether the qualifications and skills of the board reflect the desired diversity.
- 4.2 The board is responsible for performing a self-assessment once each year for the purpose of:
- identifying required board skills for the combined board based on the group companies' business model and risk profile.
 - assessing the individual members, including whether the individual members' knowledge, professional skills and experience are adequate for holding the office of board member of the company.
 - assessing the combined knowledge in the boardroom – the board's collective knowledge – whether the board members together possess adequate knowledge, experience and insight to constitute the group companies' board of directors.
 - evaluating the form, working climate, management and quality of the board work and the board evaluation of the executive management.

5. Recruitment of board members

When recruiting candidates for the board, the board focuses on attracting candidates with a variety of skills, backgrounds, knowledge and resources matching the business model and strategy of the Group Companies. The diversity of the board must make positive contributions to developing the Group and Group Companies, to risk management and to ensure that all business of the board is conducted in an adequate manner.

6. Target for the proportion of the under-represented gender on the board of each individual company

The board's target is for the proportion of the under-represented gender (man / woman) of the shareholder-elected board members to constitute not less than 20 per cent by 2020.

7. Education and training

- 7.1 If there is a need to make adjustments to the board members' qualifications, it is the chairman's duty to cause such adjustments without undue delay. Adjustments may be effected by CPD (continued professional development) or any other upgrade of individual members' skills or by changing the composition of the board. It is also the chairman's responsibility to add the necessary expertise to the board as and when required.

8. Responsibility

- 8.1 The board is responsible for preparing and complying with this policy and for contributing to promoting diversity in the group companies.
- 8.2 It is up to the general meeting to appoint a board deemed to possess the skills to be expected from the board of the relevant group company.

9. Updating of and follow-up on the policy

- 9.1 The Diversity Policy must be reviewed whenever deemed necessary by the board, however, at least once a year.

10. Effective date and signatures

This policy comes into force the 27th of March 2020.

Approved by the Board of Directors of Formuepleje Holding A/S the 17th of March 2020

Approved by the Board of Directors of Formuepleje A/S the 19th of March 2020

Approved by the Board of Directors of Absalon Corporate Credit Fondsmæglerselskab A/S the 20th of March 2020

The Policy is signed digitally following each individual board meeting in Formuepleje's allied companies by the relevant board members