Report 2022

ACCORDING TO

Task Force on Climate-related Financial Disclosures

FORMUE

FORMUE

Formue is a privately held financial life management company with 400 employees in 25 offices in Norway, Sweden and Denmark. The Group has approximately NOK 145 billion under advisory services and management for clients and is the largest independent wealth manager in Norway.

Clients' capital is invested through external managers in listed equities, bonds and in alternative asset classes such as hedge funds, private equity and real estate: capital is spread across many different funds across asset classes, sectors and geographies. To best meet our clients' holistic needs, Formue has experts in the fields of tax, law, pensions, accounting, retirement planning, sustainability and art. The specialists are integrated into the customer relationship depending on the needs of the customer.

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Formue's Sustainability journey

2017
- GRESB membership
- Norsif membership
- Equity fund carbon intensity reporting

2018
Fossil fuels excluded from new PE investments

2019
Skift membership

2020
- Target Operational Net Zero by 2025
- Client Sustainability reporting tool launch
- Skift climate report

Shaping the future of sustainable wealth management

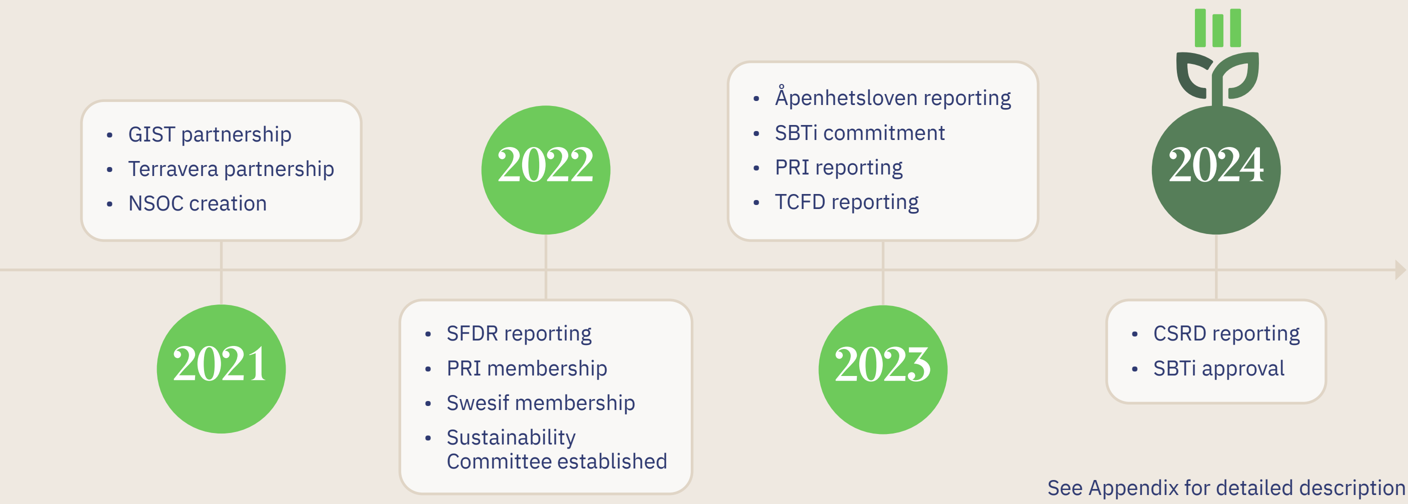
ØYSTEIN BØ
CEO

Long-term planning has always been strategically important to Formue. Our turnover of clients is less than 2% pa and most join us on the basis of a long-term relationship in which they entrust substantial financial assets to our care. The same is also true of Formue as an organisation, where turnover of staff is only 9% (vs roughly 20% across financial services) and most are shareholders in the business.

Since 2017 we have been integrating elements of sustainability into our investment process and, for the past two years, sustainability has been one of four areas for specific focus and engagement throughout the company. Clearly this covers many areas: we have initiatives in place to boost Diversity & Inclusion, increase donations to our focus charity (Partnership for Change) and protect Human Rights through our supply chain. But it is in Climate Change that we are facing the greatest urgency, and why the goal of Paris Alignment is our key sustainability priority.

Formue's vision is to contribute to a richer life for our customers by preserving and developing their wealth in a sustainable way, for present and future generations. This includes developing our business for the long-term and maximising sustainable outcomes for our clients in their personal lives, their investments and their work. It is almost impossible to do this without taking account of climate risks.

We are still early in our journey to better understand the risks from climate change and report on them in clear, quantitative ways. We don't manage funds directly ourselves, making the challenge harder: we need to rely on external managers to help us, through engagement and reporting. But this is no excuse for delaying our response, and we welcome the chance to inform all interested stakeholders as we make progress in reporting to TCFD guidelines.



See Appendix for detailed description

Executive Summary

Formue has always had a long-term outlook and a holistic view of how best to help our clients manage their wealth. This took a more climate-focused turn when Formue became an active member of Skift – the Norwegian business organisation to accelerate transition to a low-carbon economy – in 2019. We created the Nordic Sustainability Ownership Centre in 2021 to help embed sustainability in our clients' portfolios and, where relevant, their business and private lives.

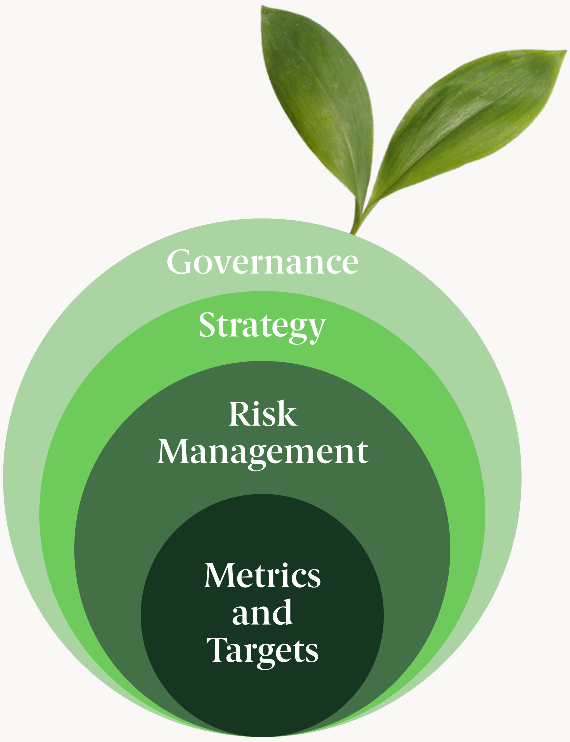
Due to our size and growth, however, it is not until recently that we have been able to formalise this approach and specify how we include climate risks into our structure and strategy. This report, based on TCFD guidelines, will clarify how we include climate-related risks into our business according to the four key areas of:

Governance – the oversight of climate-related issues at Formue

Strategy – how we plan for climate-related risks and opportunities

Risk Management – the ways in which we handle risks in Investments and Operations

Metrics and Targets – key figures we use to measure risks and Formue's own progress



It is important to differentiate in this report between climate risks pertaining to our operations and our investments. Within our planning for Net Zero and our assessment of transition or physical risks, these are two distinct areas. Within operations, we can perhaps have the fastest impact. But our operational baseline emissions for 2022 (754 tonnes CO_2e) pales into insignificance compared to the Scope 3 emissions from our financed emissions (NOK145 bn of clients' funds) and the potential value at risk from climate change.

"Our primary piece of advice for companies beginning to address climate related risks and opportunities is that they cannot wait until the data and methodologies are perfect to begin their disclosure journey"

TCFD-guidance

Describe the Board's oversight of climate-related risks and opportunities

Governance

The Non-Executive Board meets monthly and will include any sustainability-related issues when required. This includes approval of any binding targets (such as SBTi-linked emissions reductions commitments) and signing-off on public reports (such as the PRI and SFDR Pre-contractual disclosure).

The Executive Board (F1) has more regular and direct oversight of climate related risks and opportunities within Formue. Most F1 members are part of the Sustainability Committee (SusCo), which also includes Formue's sustainability advisors and compliance representatives. This meets at least quarterly and will react to, or suggest action to, the sub-committees responsible for sustainability within Operations, Investments, and Client-facing roles (see chart).

The SusCo is responsible for approving internal policies to do with sustainability, such as Formue's Sustainability Policy, Supplier Code of Conduct, or Diversity & Inclusion. It also has responsibility to communicate key issues up to F1 and the Non-Executive Board.

	SusCo	Investments SusCo	Operations SusCo	Client-side SusCo
Members	• Sustainability Advisor • CEO • CIO • CFO • Head of FWS (Family Wealth Services) • Strategy Head	• Sustainability Advisor • Deputy CIO / Investments COO • IR Reporting Manager • Asset Class reps*	• Sustainability Advisor • HR Representative • CTO • Office Managers	• Sustainability Advisor • Formue X Delivery • Business Compliance • Weath Managers • CMO
	Compliance			

* Rotating reps depending on needs/ agenda

Formues sustainability team (NSOC): Philip Mitchell, Fridtjof Wergeland, Helena von der Esch

Describe management's role in assessing and managing against new and former commitments climate-related risks and opportunities

The report has helped highlight to us how much still needs to be done to accurately reflect and integrate climate risks into our business, and much of this will require progress for the wider industry. But, in the words of the TCFD itself: These Sustainability Committees are not a forum for discussion. They operate as an effective tool for setting priorities and ensuring information flow within the organisation. The Board will be involved in any decision about new climate-related products, regulatory alignment, or strategic decisions, both for its investments and as an operating entity.

2022 was a year of great change within Formue in which there were many examples of how the business adjusted its various commitments to account for climate-related risks and opportunities. The table below attempts to explain some of these changes:

	Former policy	New Policy	Management role
Net Zero commitment	Aligned with Skift (Norway) carbon neutral by 2025 and 50% reduction in emissions in portfolios by 2030.	Committed to SBTi Net Zero and short-term target of a **65% reduction** in operational emissions by 2027.	CEO and CIO understood the benefits of committing to a global, credible Net Zero body, with strict inclusion of Scope 3. CFO fast-tracked review and audit of GHG baseline.
Nordic Sustainable Ownership Centre	Sustainability initiatives driven by Strategy Chief and Deputy-CIO. Lacking capacity for external engagement.	Invested in **two full-time sustainability advisors and one family wealth advisor**. Specific mandate to improve Formue's internal sustainability policies but also help clients with investments/ companies to respond to climate risks and opportunities.	The CEO and Head of Family Wealth Services had the commitment to innovate and invest in this area.
Responsible investment	Due diligence process included ESG but some KPIs lacking definition. Wealth managers lacking tools to inform clients of sustainability options and no SFDR-defined product for clients.	Tighter due-diligence with more KPIs and **well defined "ladder of progress"**. Various employee **training initiatives** and improved client portal for expressing preferences. Core product also defined as Article 8 under SFDR, with all resulting reporting requirements.	Strategy Chief and CIO invested in platform to better align client preferences. Board approved membership of UN PRI and Swesif (to complement existing membership of Norsif).

Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term

Strategy

Investment Strategy

Our clients tend to take a very long-term perspective for their wealth and this gives us a wider array of options in which to invest. This is reflected in the relatively high share of illiquid 'real' assets in the portfolios of most clients. On average over 30% of a client's assets are held in a combination of Private Equity, Real Estate, Private Credit and Hedge Fund portfolios where there is no daily, weekly, or even monthly liquidity.

Our asset allocation does not specifically reference climate scenarios in its decisions, and formal analysis of such scenarios is not a part of our due diligence with external managers. Given the relative lack of data for some asset classes, and the fact that we are more distanced from the underlying assets (by using 3rd party managers) this is an area where we need to improve our visibility.

In the future we hope to conduct scenario analysis with defined timelines and temperature pathways, to better assess the risks and opportunities in our portfolios. Climate change certainly presents risks and opportunities to our investments and potential assets under management, and below we have broken these down into Transition risks and Physical risks. Transition risks and opportunities tend to be more near-term (less than five years). Physical risks may also be near-term but are likely to increase in severity longer-term.

Investment Strategy

	Risks	Opportunities
Transition	Some clients do not believe in and/or want to invest sustainably – we cannot alienate them. Reputational risks if we fail to deliver on our commitments. Lack of data and regulatory uncertainty increase the risks of inadvertent greenwashing.	Intermediary in the wave of inflows required to finance the global transition. Potential inflows from clients unable to source suitable investments directly. Access to long-term capital makes us a more attractive investment partner. Innovation in asset classes provides both investor interest and risk-hedging.
Physical	Extreme events increase the chance of asset destruction and redundancy of existing services. Tipping points are hard to predict and can distort all insurance/ risk models. Most primary capital investment options are very illiquid and cannot be exited quickly.	Increased due-diligence and disclosure around climate-change preparedness should generate alpha in portfolios. Purchase of assets where engagement and climate mitigation can offer valuation upside (notably in equities and real estate)

Business Strategy

This relates to the operating assets at Formue: our offices, suppliers, and clients. Given the relatively smaller scale of our footprint compared to investments, the risks and opportunities here are less significant longer-term, but our ability to impact mitigation and adaptation is greater near-term.

Business Strategy

	Risks	Opportunities
Transition	Investments required in new talent and reporting mechanisms Regulatory uncertainty and risk of compliance over-reach Less scrupulous competitors misleading clients over ESG claims to gain market share	Cost savings from lower emissions policies, notably in reduced transport costs and IT spend. Employee retention increases and Formue can become a more attractive workplace based on sustainability credentials Innovation boosted by willingness to adapt to climate change and improve sustainability processes
Physical	Potential supplier redundancy from extreme events. Cost inflation as a result of supply-chain disruption.	Population growth (and likely economic growth) in more temperate northern Europe Access to plentiful hydroelectric power and (soon) wind should reduce energy costs.

Describe the organisation's processes for identifying and assessing climate-related risks

Risk Management

Operational Risk

Operational Risk is handled by the Compliance & Risk (C&R) team at Formue. Operational risk is the specific risk to Formue that does not involve the financial, systematic or market general risk; it is the risk a company is left with in its internal processes, people and systems.

The C&R team work actively with risk management to ensure that the company operates with the right level of operational risk. We use Synergi, a tool for risk management, risk mitigation, reporting operational errors and handling deviations from controls. Together with the divisional teams, we identify risks and advise management and process owners where they are most at risk.

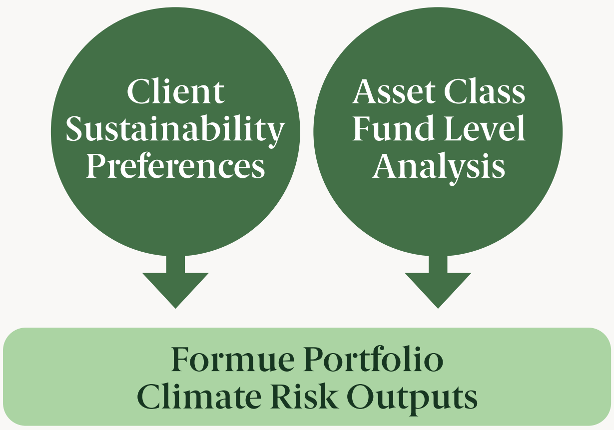
As part of our engagement with suppliers, to better understand risks in our supply chain and accurately report to Åpenhetsloven (a Norwegian law governing supply chain sustainability) we now expect suppliers of services and equipment to provide information about their own emissions and whether they have plans in place to reduce these emissions over time. As a result, it has become easier to see where climate-related risks lie in the supply chain, how this might affect our operations, and attempt to offer remedial action.

Investments Risk

Formue has an implicit responsibility to provide the best possible risk-adjusted returns for its clients over the long-term, and these risks are often related to sustainability issues (usually described as one or more of Environmental, Social or Governance factors). It is therefore vital that risks associated with these are incorporated into our investing process.

Within investments, analysis of Climate-related risks is still mostly an output from our portfolio construction, rather than an input. We use the MSCI Climate Risk Dashboard to track such risks but this only feeds off our liquid assets (c.68% of total AUM).

The first element affecting sustainability risks in the portfolio is to map the clients' own wishes - 'Sustainability Preferences'. Do they want to rely on an exclusions-based strategy, our standard Article 8 portfolio, or a portfolio with extra focus on the Environment and more sustainable investments? This sets the boundaries for their portfolio.



The second element of sustainability risks is the asset class mix and choice of funds within each asset class. Formue itself is not responsible for the day-to-day stock-specific composition of its funds, but relies instead on due diligence and review meetings with fund managers to ensure that sustainability risks are being considered appropriately. Given our core belief in "financing the transition" which will allow the global economy to be Paris Aligned with less than 1.5 degrees of warming, we have a specific focus on how fund managers view transition risks and opportunities and incorporate them into their process.

Sustainability is integrated in the investment process

1. First evaluation	2. Introduction meeting	3. Analyses	4. Negotiations or structuring	5. Continuous follow-up
Sourcing and screening	**Identification of potential improvements**	**Detailed review of ESG policy**	**Side letters; mandate agreements**	**Engagement to bring about change**
• Investment process • Transition risk / opportunities • ESG solutions focus • Are social factors covered • Can we engage with this manager	• Is there a formalized ESG policy • Is ESG integrated into the process • Does transition risk have a central role in the process • Is diversity taken seriously	• Evidence of systematic use of objectives, data, measurement • Use of best practice standards • Memberships and regulatory classifications	• Carbon data requirement in private equity and real estate investments • Managed acounts used to achieve structural objectives in certain public market invest-ments	• Use of data in the on-going evaluation wherever possible • Proactive follow-up based on internal evaluation objectives • Formue classification objectives

Fund managers are classified according to their integration of ESG, based on a series of KPIs. The classification is based on a thorough evaluation of the manager's ESG commitment, integration, and leadership across multiple dimensions including:

- the presence of a formal ESG policy
- the integration of ESG metrics throughout the investment process
- alignment with global frameworks like PRI and TCFD
- a focus on sustainable transitions and solutions.

Additionally, it evaluates the manager's leadership in areas such as Sustainable Development Goals (SDGs), B-Corp incorporation, innovative social impact reporting, and thought leadership in academia.

Our intention is to increase due diligence around TCFD reporting from 2024, with greater engagement on climate risk reporting and how it is integrated into the fund manager's process.

Manager sustainability classification ladder

Classification	Process description (Formue due diligence view)
Weak	The manager has no ESG policy or written principles
Basic	The manager has a formalized ESG policy. There is clear evidence that ESG is integrated into the investment process
Progressive	(1) Transition risk / opportunities is a core factor in the investment process (2) An ESG solutions orientation is central in the investment process And both of the following: - The ESG policy contains clear governance principles - Social factors are comprehensively covered
Leader	The process include portfolio targets, numerical targets/KPIs, measurement and comprehensive reporting to investors. There is evidence that best practice standards have been adopted, the culture is innovative and ESG leadership oriented

Review meetings occur at least annually and Formue engages in ongoing dialogue with managers with the aim of influencing the development of their process. Notably we encourage fund managers to engage with portfolio companies to set transition plans. Since the introduction of SFDR in 2022, these meetings will also include discussion of the key KPI's which Formue uses to report and align with SFDR, notably:

- GHG-related Principle Adverse Impacts (PAI) and
- the share of the portfolio which has set an approved Science Based Target (SBTi).

By working to improve the overall PAI score, and maximise exposure to SBTi-approved companies (ie those with a clearly-defined, audited transition plan) sustainability risks related to global warming should be minimised. For non-environmental factors, we rely on good governance to indicate risk reduction. We require that external managers have clearly articulated good governance principles (in line with OECD norms) and respond to our annual reporting questionnaire (sent to all operational and investment suppliers). We will not invest with a fund manager whose process and portfolio breaches UN norms and conventions.

Asset Class Specifics

At each asset class level, the responsible teams take account of climate risks via more qualitative methods. Each team operates within very different timeframes for their investments, and therefore incorporates climate risks in different ways.

Share of Formue AUM by Asset Class (end 2022)

Hedge Funds 15%

Private Equity 9%

Property 8%

Fixed Income 30 %

Listed Equity 38%

Equities & Bonds:
Formue's Equity and Bond funds follow the previously outlined method for analyzing climate and transition risks during due diligence. In addition to the standardized process, they are able to base their monitoring of the funds through a more quantitative approach based on SFDR PAI (Principal Adverse Impact disclosures under the Sustainable Finance Disclosure Regulation) data from the funds. The teams conduct analysis based on quarterly data, including 14 mandatory and 2 optional PAI indicators, which are compared to a relevant benchmark to our funds. Dedicated meetings with our fund managers are set up on a yearly basis, where we discuss their worst performing assets in terms of these indicators. We expect external managers to be able to explain why 'hotspots' of negative impact exist in portfolios, and how they will be reduced over time (normally within two years).

Private Equity
Our private equity (PE) investments have a longer-term horizon due to the illiquid nature of the investments. Climate and transition risk focus is emphasized here as the committed capital will be locked in for a longer period of time. For example, in 2016 we took the decision not to invest in any new private equity funds with upstream fossil fuel exposure given the long-term nature of these investments.

Formue is active on several advisory boards where the team is able to influence the handling of transition risks and ESG goals of the individual funds. Additionally, carbon data is always requested from the funds as part of our side letters (although this does not always include Scope 3 data and is sometimes more challenging for smaller funds). The PE team produces engagement follow-up plans based on the areas of improvement that have been identified in the due diligence process.

Real Estate:
Our real estate investments also have a longer-term focus, meaning climate risks and their potential impact on valuations have been an important consideration since 2018, when Formue joined GRESB. This longer term perspective allows us to make a meaningful impact by investing in funds dedicated to acquiring and renovating old buildings, ultimately raising their environmental standard. This typically includes improving the standards for water usage, waste handling, and carbon emissions. The impact of our Core+ investments (c.30% of holdings) can be tracked through GRESB reporting standards, allowing the Real Estate team to get more consistent insight into the ESG performance of the investments and use this as topics for follow-ups with the fund managers.

Hedge Funds:
Hedge funds tend to provide our clients with lower volatility returns and can operate within a range of time horizons – from high-frequency trading to holding long-term positions.
Their wide range of often complex financial instruments means that it is hard to report on their characteristics in a purposeful and efficient manner, and currently hard to track climate and transition risks. Some hedge funds will take account of climate and transition risk related issues and attempt to find related arbitrage opportunities. As such, Formue's standard due diligence and follow-up process is difficult to apply to these types of investments outside of the wider Governance-related issues.

Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process

Metrics & Targets

Like many financial advisors using external fund managers, data availability is a key challenge. As such, we have chosen to initially focus on a few measures where we are confident we can adhere to the TCFD's own guidance on what makes metrics useful to report on climate-related risks:

- Decision-useful
- Clear and understandable
- Reliable, verifiable and objective
- Consistent over time

As previously disclosed, 2022 saw Formue shift its sustainability targets in recognition of changes in definition (for example Net Zero vs Carbon Neutral) but also to align our goals with a sustainable philosophy based on Transition rather than straight-line carbon reduction.

As a result, we now have the following KPIs driving our climate-related risk assessment: (still pending approval of SBTi targets)

	Old KPI	New KPI
Investments emissions	Reduce total CO_2e emissions by 50% by 2030	Increase SBTi coverage of liquid portfolios from 23% in 2022 to 45% by 2027
Operational Carbon Neutral	Net Zero by 2025 and offset historic emissions	Carbon Neutral by 2025 and a 65% reduction in Scope 1, 2 & 3 emissions by 2027.
SFDR reporting	N/A	Reduction in negative Principal Adverse Impacts from GHG-related factors and increase in companies with transition plans.
TCFD support	N/A	Coverage of external fund managers supporting TCFD (and reporting in future)

TCFD reporting by our fund managers
Information is not publicly available on which fund managers report to TCFD guidelines, but we can analyse how many of our fund managers at least support the TCFD process, and we would view improvement in our 'coverage ratio' as a KPI for climate risk awareness amongst our external managers.

“Support indicates that your organization believes the TCFD recommendations provide a useful framework to increase transparency on climate-related risks and opportunities within financial markets. For companies, support is a commitment to work toward their own implementation of the TCFD recommendations.”

TCFD-guidance

The following chart shows our coverage of TCFD supporters by asset class. It is impossible for us to know how this compares to the entire industry, but a recent survey by TCFD revealed that fewer than 10% of Fixed income, PE or Property investors report on Climate targets or Physical risks, and this figure is less than 20% for Equities, ie. Overall levels of disclosure are still low.

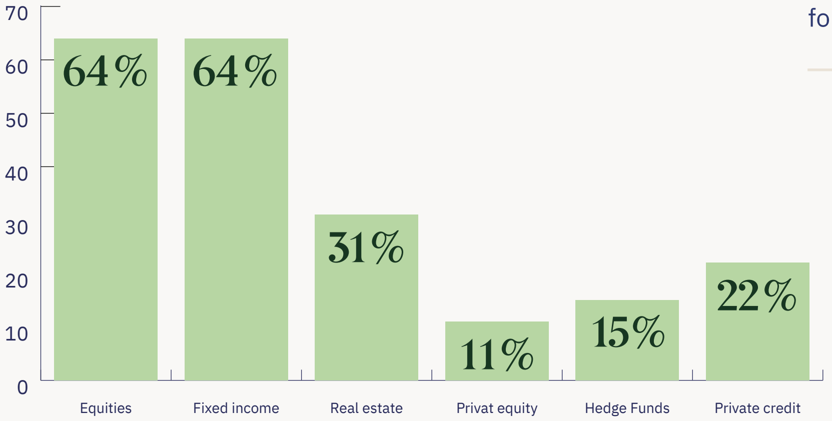
49 %

Of our AUM is managed by TCFD supporters

34 %

Of our managers formally support the TCFD

% TCFD supporters per asset class within Formue

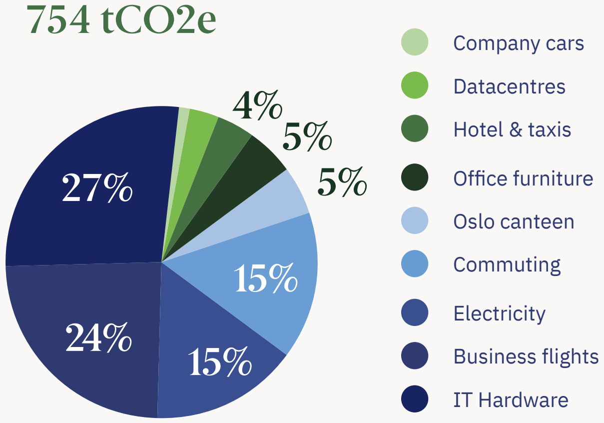


Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks

The GHG baseline for 2022 excludes our Category 15 ‘Financed emissions’ where over 95% of our groupwide emissions would likely be.

Only 18% of these emissions are Scope 1& 2 (cars and electricity) with the remainder from Scope 3 (excluding category 15).

Operational GHG Breakdown: 754 tCO2e



Our plans for a 65% reduction in gross operational emissions by 2027 focuses on the following:

- Phase out all non-electric company cars by 2024
- Purchase certificates of origin for electricity in all offices in Norway, Sweden, and Denmark
- Ensure suppliers of datacenters have a 100% renewable energy target by 2025
- Reduce volume of purchased new furniture
- Updated travel policy (10% pa reduction in flights, and purchase of biofuel where possible)
- Dramatic reduction in IT hardware purchases (including only refurbished monitors from Q4 2023).

To accelerate our net carbon reduction, from 2024 we will be investing in c.300 tonnes of nature-based carbon removal (in Sweden), which will also include biodiversity measures.

Financed emissions are currently only known with any consistency across the Equity and Fixed income elements of our clients funds, accounting for c.67% of Formue's discretionary AUM. Even here, MSCI data is very dependent on estimates for Scope 3 and, within fixed income, data coverage is just under 50% (partly due to very poor coverage within sovereign debt). This is one of the reasons we have chosen to focus on SBTi approval as a key measure of transition alignment in our funds, rather than a straight-line GHG reduction path.

As the share of our property assets reporting to GRESB increases (currently c.40%) and reporting from Private Equity funds becomes more consistent, we would hope to include these asset classes within our SBTi coverage ratio and/or GHG footprint in the next two years.

Apart from physical and transition risks to the companies (and countries) in which we invest, the biggest risk from the emissions above is likely financial in the event of a globally coordinated carbon tax. Although a global tax is unlikely, the EU's recent introduction of a Carbon Border Adjustment Mechanism and various country-specific carbon taxes are signs of how this could become more widespread over time.

At an operational level, such a tax would have a fairly immaterial impact on Formue costs and group operating profits (less than a 1% hit). It could however result in a material impact on companies in our client portfolios, with reduced profits from paying such a tax and having to "internalise" their CO_2 externalities. Given Formue's investments have a generally lower carbon intensity than the index, we would expect any financial impact to be less severe than for the wider market in the event of such a tax.

Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets

The key targets used to manage any long-term risks are the same as those we will be reporting on to map our progress towards Paris-Aligned activities. That is to say:

- Reduction in CO_2 emissions from our operations (including all relevant scope 3)
- Increasing coverage of our portfolios with Net Zero-aligned companies
- Reduction in negative PAIs in our portfolios, coupled with greater evidence of companies with transition plans.

2023 was the first year we had a quantified baseline (for 2022) and that we set such goals, meaning that it is difficult to quantify any progress towards these goals so far. However, some qualitative feedback from 2023 would include:

- Setting of plans to reduce non-financial emissions, notably in business travel, electricity use, and procurement of IT (responsible for 70% of total operational emissions).
- Internal and external education of investment teams around the new SBTi-based coverage targets.
- Reporting to SFDR and Åpenhetsloven for the first time, with clear benefits for our business in terms of improved visibility around climate change "hotspots", both in our supply chain and investments.

Appendix

Areas of Disclosure Recommended by TCFD but not specifically included in this report – hopefully to be included as part of our 2024 report.

Strategy: Describe the impact of climate-related risks and opportunities scenario analysis on the organisation's businesses, strategy, and financial planning

Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a +2°C or lower scenario

Risk Management: Describe the organisation's processes for managing overview of our risk management climate-related risks

Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.

Description of acronyms and organisation names

Åpenhetsloven – Norwegian law on supply-chain reporting

CSRD – EU Corporate Sustainability Reporting Directive

GIST – Platform for measuring and quantifying Impact (now part of MSCI)

GRESB – Global Real Estate Sustainability Benchmarking organisation

NSOC – Formue's own Nordic Sustainable Ownership Centre

Norsif – Nordic Sustainable Investment Forum

PRI – UN Principles for Responsible Investing

SBTi – Science Based Targets initiative (Net Zero goal-setting)

Swesif – Swedish Sustainable Investment Forum

Skift – Norwegian organisation of businesses looking to lead on climate action

Terravera – Non-profit platform to model sustainable value chains

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