

# REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”)

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- [Article 3](#)
- **Transparency of sustainability risk policies**
  - *Saab Pension fund (“the Pension Fund”) has integrated sustainability risks into the investment decision-making process.*
- [Article 4](#)
- **No consideration of adverse impacts of investment decision on sustainability factors**
  - *While the Pension Fund is committed with the promotion of environmental, social and governance factors it has decided not to consider the adverse impacts of its investment decisions on sustainability factors as per SFDR article 4.1(b) for sustainability factors(PAI).*
  - *The Pension Fund’s decision not to consider the adverse impact as per above is based on the size, nature, scope and complexity of the Pension Fund. A full consideration as per the article and the cumbersome application of the article could have a negative impact on the profitability and the aim of the Pension Fund .*
  - *The Pension Fund does consider environmental, social and personnel-related issues, respect for human rights and the fight against corruption and bribery in its the risk management as well as the investment decisions.*
  - *The Pension Fund also considers the prudence principle in its investment decisions where the sustainability risks are integrated into the risk management as well as the investment decisions.*

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- [Article 5](#)
- **Transparency of remuneration policies in relation to the integration of sustainability risks**
  - *The Pension Fund has a sound remuneration policy regarding sustainability risks. Remuneration is based on competence, responsibility and performance.*
  - *The Pension Fund also considers cooperation and work ability that the individual possesses. Salary or fees or other terms of employment may not create incentives for risk-taking that are incompatible with the Pension Fund's investment guidelines or risk profile. The Pension Fund only compensates external members of the board or committees.*
- [Article 6](#)
- **Transparency of the integration of sustainability risks**
  - *Sustainability risks are integrated in the Due diligence-process, which it is a part of the investment process.*
  - *The Pension Fund evaluates the sustainability risk in the investment quarterly and present to the board of directors in the sustainability report.*