CARBON DISCLOSURE PROJECT

Building business resilience in the Nordic region

CDP Nordic 260 Climate Change Report 2012

On behalf of 655 investors
with assets of US$ 78 trillion

Scoring Partner

FirstCarbon® SOLUTIONS

Contents

> "Nordea periodically undertakes climate footprinting of its portfolios using data produced via CDP. This is carried out as an indicator of the carbon sensitivity of its investments."
>
> Nordea

CEO Foreword

"CDP has pioneered the only global system that collects information about corporate behaviour on climate change and water scarcity, on behalf of market forces, including shareholders and purchasing corporations."

The pressure is growing for companies to build long-term resilience in their business. The unprecedented debt crisis that has hit many parts of the world has sparked a growing understanding that short-termism can bring an established economic system to breaking point. As some national economies have been brought to their knees in recent months, we are reminded that nature's system is under threat through the depletion of the world's finite natural resources and the rise of greenhouse gas emissions.

Business and economies globally have already been impacted by the increased frequency and severity of extreme weather events, which scientists are increasingly linking to climate change[1]. Bad harvests due to unusual weather have this year rocked the agricultural industry, with the price of grain, corn and soybeans reaching an all time high. Last year, Intel lost $1 billion in revenue and the Japanese automotive industry were expected to lose around $450 million of profits as a result of the business interruption floods caused to their Thailand-based suppliers.

It is vital that we internalize the costs of future environmental damage into today's decisions by putting an effective price on carbon. Whilst regulation is slow, a growing number of jurisdictions have introduced carbon pricing with carbon taxes or cap-and-trade schemes. The most established remains the EU Emissions Trading Scheme but moves have also been made in Australia, California, China and South Korea among others.

Enabling better decisions by providing investors, companies and governments with high quality information on how companies are managing their response to climate change and mitigating the risks from natural resource constraints has never been more important.

CDP has pioneered the only global system that collects information about corporate behaviour on climate change and water scarcity, on behalf of market forces, including shareholders and purchasing corporations. CDP works to accelerate action on climate change through disclosure and more recently through its Carbon Action program. In 2012, on behalf of its Carbon Action signatory investors CDP engaged 205 companies in the Global 500 to request they set an emissions reduction target; 61 of these companies have now done so.

CDP continues to evolve and respond to market needs. This year we announced that the Global Canopy Programme's Forest Footprint Disclosure Project will merge with CDP over the next two years. Bringing forests, which are critically linked to both climate and water security, into the CDP system will enable companies and investors to rely on one source of primary data for this set of interrelated issues.

Accounting for and valuing the world's natural capital is fundamental to building economic stability and prosperity. Companies that work to decouple greenhouse gas emissions from financial returns have the potential for both short and long-term cost savings, sustainable revenue generation and a more resilient future.

Paul Simpson
CEO Carbon Disclosure Project

1: The State of the Climate in 2011 report, led by the National Oceano-graphic and Atmospheric Administration (NOAA) in the US and published as part of the Bulletin of the American Meteorological Society (BAMS)

Guest Foreword

"We need to promote competitiveness, prosperity and quality of life within the limits of our planet."

As the world struggles to exit from the financial and economic turmoil, we must look ahead and focus not only on jobs and growth, but also on the type of growth we want. We can no longer continue to ignore the severity of debt in our natural capital. Environmental degradation is becoming more and more evident everywhere. The state of our oceans, soils, forests and biodiversity, and the impacts of climate change are just some of the signs that we are beginning to see. This will have severe consequences not only on health and the environment but also on the economy.

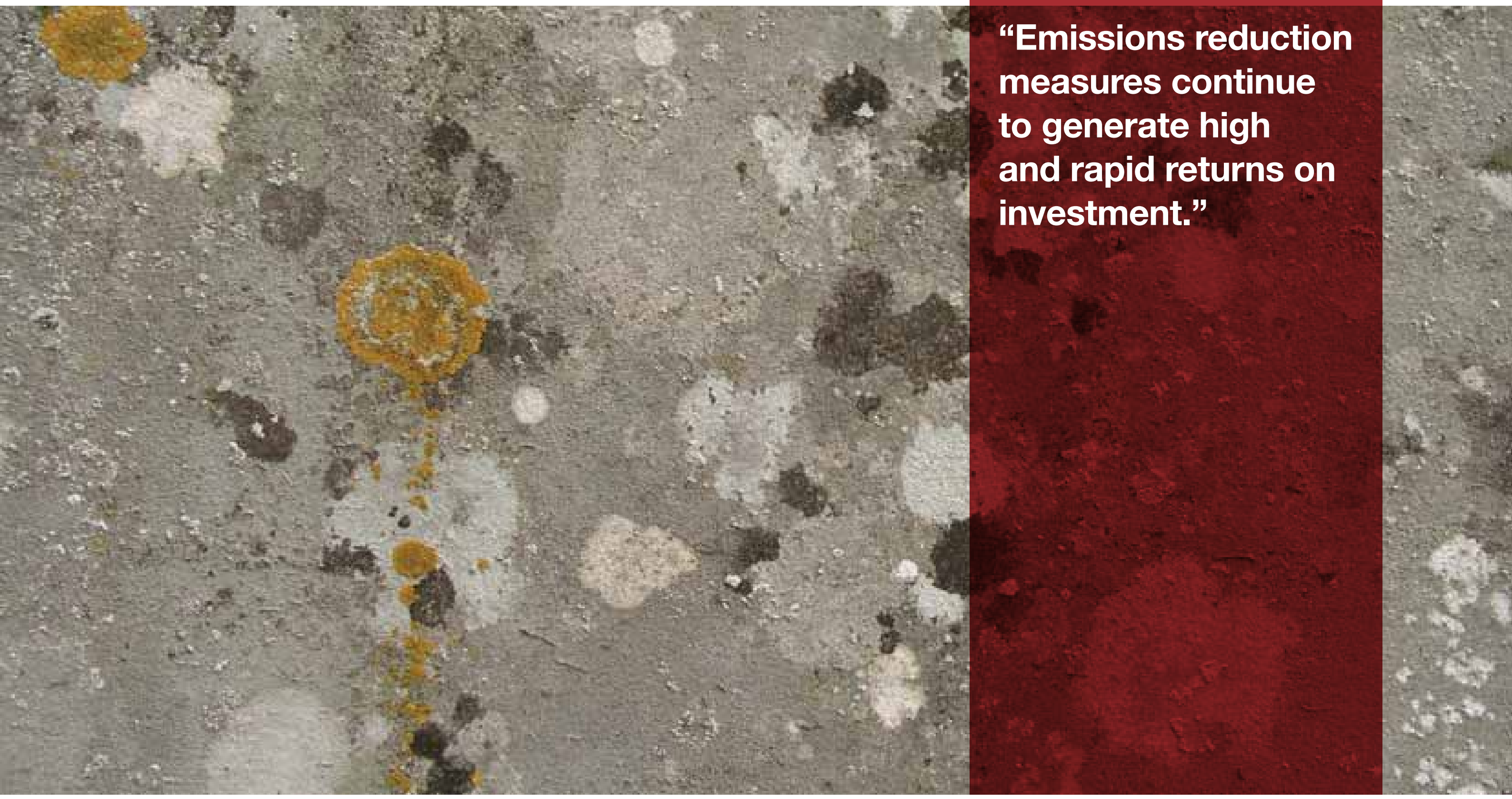
If we do not want resource scarcities and pressures to be a major constraint on growth in the near future, we need to promote competitiveness, prosperity and quality of life within the limits of our planet. This is why the European Commission places resource efficiency at the centre of its agenda for economic transformation. The objective is to achieve environmentally compatible growth, decoupling resource use from economic growth and reducing greenhouse gas emissions.

The important impact of better resource efficiency on climate change is too often underestimated. This is why I welcome CDP's vision to widen its scope to include natural capital and resources. It reflects an important change in the approach of corporations. Companies need stronger, more long-term price signals to produce returns on investment, and it is for public authorities to provide the right signals, incentives, direction and most importantly leadership. We need to move from a short-term to a more long-term vision that will help us see that there is a clear link between resource efficiency and increased profitability, and improve on both.

Our most important resource is our natural capital and the benefits that we draw from nature year after year. If we erode that capital for short-term gains, we are simply gambling with our future. There will be no growth in the future if it is not sustainable, if it is not resource efficient. This is already necessary for our generation, but indispensable for the next.

Dr Janez Potočnik
European Commissioner for the Environment

Executive Summary



"Emissions reduction measures continue to generate high and rapid returns on investment."

Incremental improvements

The number of Nordic companies responding to the CDP questionnaire increased again in 2012. The quality of disclosure improved, as evidenced by both an increase in average disclosure scores and a higher threshold for the Carbon Disclosure Leadership Index (CDLI). Even more importantly, average CDP performance scores increased, with improvements in all of the key performance indicators.

Slow progress on emissions reductions

Nordic companies' greenhouse gas (GHG) emissions fell slightly in 2011 (the year covered by most CDP 2012 responses), but by less than might have been expected given the slowdown in the economy. At most individual companies, emissions reduction activities outweighed the impact of any growth in output by individual companies. Overall, however, this effect is largely cancelled out by rising output at a number of large emitters.

High and rapid returns on investment

At the same time, emissions reduction measures continue to generate high and rapid returns on investment. Of a total of 490 measures disclosed, 248 are expected to pay off within three years, and 130 of these within one year. This implies, on the one hand, a case for continued investments even during a period of careful cost control. On the other hand, rapid pay-offs may be a sign that companies are focusing on low-hanging fruit, and that there is scope for additional self-financing measures, albeit with a longer investment horizon.

Low ambition on targets - some exceptions

Of a total of 145 respondents, 103 disclosed at least one explicit target for reducing emissions. However, the great majority of these targets (with some notable exceptions) fall short of the level of ambition needed to meet stated national and international goals for GHG emissions in the longer term. This suggests that large companies are likely to come under increased pressure – from consumers and stakeholders as well as regulators – to cut emissions in future.

Managing risks

In a highly uncertain economic environment, GHG emissions represent a source of risk that firms can exercise at least a degree of control over. More stringent climate-related regulation and taxation is a material risk for some companies in emissions-intensive sectors. Elsewhere, most firms cite regulatory risks as significant, although there are few indications that regulation might pose a serious threat to the business. In sectors with limited exposure to regulation, reputational risks appear to be a strong driver of efforts to control emissions.

CDP responses provide some concrete indications of the potential financial implications of failing to mitigate such risks. Estimates from several companies suggest that a moderate increase in the price of carbon would increase total costs by around 1% or less – manageable perhaps, though still sufficient to make a dent in profits or to justify emissions reduction programmes. While few companies attempt to quantify reputational risks, the available assessments suggest that these may be substantially higher. Several respondents use the word 'devastating', while others point out that equity and brand values would suffer directly if companies were not seen to be playing their part in addressing climate change.

CDP Investor Signatories 2012

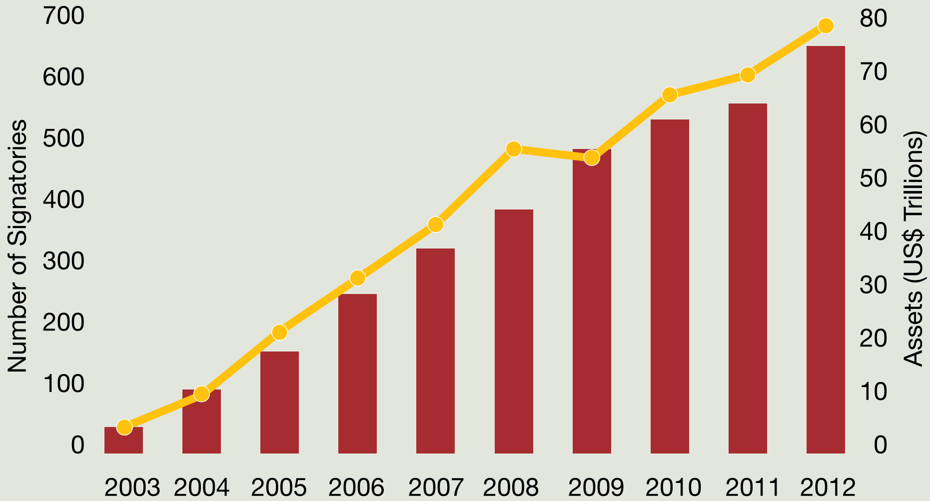
Nordic CDP Investor Signatories 2012
Full list of signatories globally at https://www.cdproject.net/investorsignatories

ATP Group
BankInvest
DnB NOR ASA
Erik Penser Fondkommission
Evli Bank Plc
FIM Asset Management Ltd
First Swedish National Pension Fund (AP1)
Folketrygdfondet
Folksam
Fourth Swedish National Pension Fund (AP4)
Gjensidige Forsikring
Ilmarinen Mutual Pension Insurance Company
KLP Insurance
KPA Pension
Landsorganisationen i Sverige
LD Lønmodtagernes Dyrtidsfond
Mistra, Foundation for Strategic Environmental Research
Mutual Insurance Company Pension-Fennia
Nativus Sustainable Investments
Nordea Bank
Norges Bank Investment Management (NBIM)
Nykredit
OP Fund Management Company Ltd
Opplysningsvesenets fond (The Norwegian Church Endowment)
Pension Denmark
Pension Fund for Danish Lawyers and Economists
Pensionsmyndigheten
PFA Pension
PKA
Pohjola Asset Management Ltd
Sampension KP Livsforsikring A/S
Second Swedish National Pension Fund (AP2)
Seligson & Co Fund Management Plc
Seventh Swedish National Pension Fund (AP7)
Skandinaviska Enskilda Banken AB (SEB AB)
Storebrand ASA
Svenska Kyrkan, Church of Sweden
Svenska Kyrkans Pensionskassa
Swedbank
Terra Forvaltning AS
The Central Church Fund of Finland
The Local Government Pensions Institution
Third Swedish National Pension Fund (AP3)
Tryg
Unionen
Unipension

1 **CDP INVESTOR SIGNATORIES & ASSETS (US$ TRILLION) AGAINST TIME**

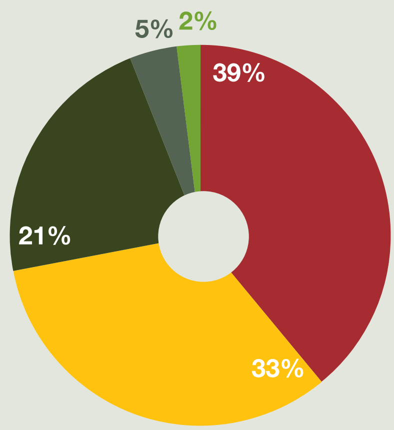
• Investor CDP Signatories
• Investor CDP Signatory Assets

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Signatories	35	95	155	225	315	385	475	534	551	655
Assets	4.5	10	21	31	41	57	55	64	71	78



2 **2012 INVESTOR SIGNATORY BREAKDOWN**

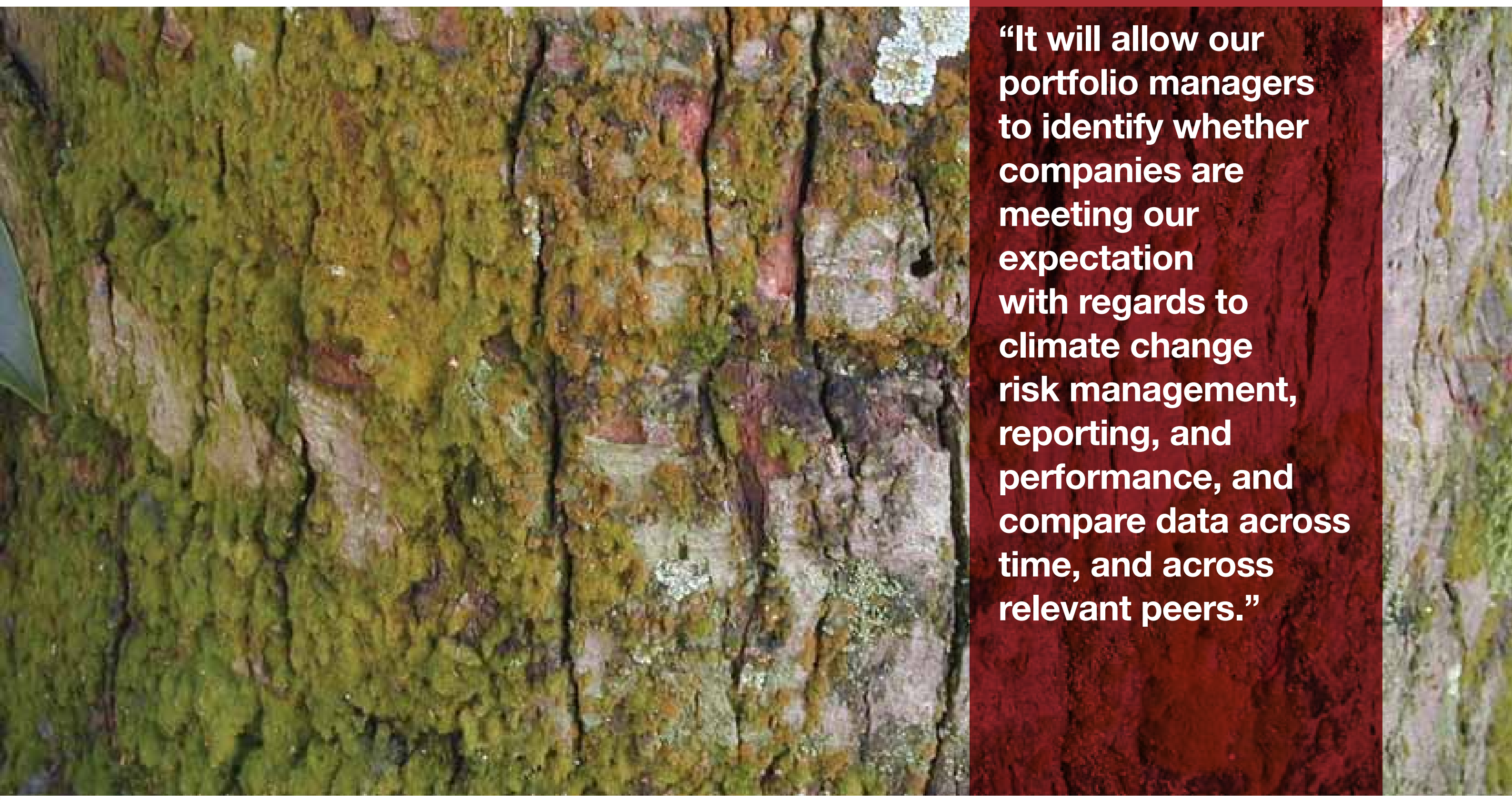
259	Asset Managers
220	Asset Owners
143	Banks
33	Insurance
13	Other



CDP Investor Members 2012

Aegon
AKBANK T.A.Ş.
Allianz Global Investors
Aviva Investors
AXA Group
Bank of America Merrill Lynch
Bendigo and Adelaide Bank
Blackrock
BP Investment Management
California Public Employees Retirement System - CalPERS
California State Teachers Retirement Fund - CalSTRS
Calvert Asset Management Company
Catholic Super
CCLA
Daiwa Asset Management Co. Ltd.
Generation Investment Management
HSBC Holdings
KLP
Legg Mason
London Pension Fund Authority
Mongeral Aegon Seguros e Previdência S/A
Morgan Stanley
National Australia Bank
NEI Investments
Neuberger Berman
Newton Investment Management Ltd
Nordea Investment Management
Norges Bank Investment Management
PFA Pension
Robeco
Rockefeller & Co.
SAM Group
Sampension KP Livsforsikring A/S
Schroders
Scottish Widows Investment Partnership
SEB
Sompo Japan Insurance Inc
Standard Chartered
TD Asset Management Inc. and TDAM USA Inc.
The RBS Group
The Wellcome Trust

Investor Perspective



"It will allow our portfolio managers to identify whether companies are meeting our expectation with regards to climate change risk management, reporting, and performance, and compare data across time, and across relevant peers."

What is NBIM's policy on corporate climate risk management?
We expect portfolio companies to identify material risks, define an optimal mitigation strategy and take action to implement that strategy. Companies should also have a well-functioning governance structure for risk and be transparent in their interaction with policy-makers and regulators. They should disclose sufficient information demonstrating an effective approach to climate change risk, including key performance indicators on greenhouse gas emissions.

How does NBIM use CDP data?
NBIM uses CDP data as a source of company-level information on climate change risk for our portfolio managers. We are supportive of the standardised questions and answers in the CDP Information Request, as this helps us integrate CDP data with our internal data platforms in ways that we find beneficial. The growth in the number of companies reporting to CDP means a greater share of our global equities portfolio is covered each successive year.

We are in the process of incorporating CDP data into our internal investment data platform. It will allow our portfolio managers to identify whether companies are meeting our expectation with regards to climate change risk management, reporting, and performance, and compare data across time, and across relevant peers. In turn, each portfolio manager can form an opinion about the significance and relevance of the information for the companies they cover.

Which CDP data points are disseminated to NBIM's portfolio managers?
We have produced a framework for assessing companies relative to climate change risk based on our own weighting of individual CDP data points. The framework considers indicators related to governance structure, risk assessment, strategy implementation, reporting, and performance, each of which is linked to a CDP data point. For example, we review the companies' own assessment of their exposure to various climate change risks, and the actions they have taken to reduce their risk exposure.

We also use CDP data to identify whether companies have lines of reporting up to board level and whether they disclose their position and political activities relative to climate change regulation. We measure performance by considering emissions reduction targets and tracking whether greenhouse gas emission intensity is increasing or decreasing, and whether emissions data have been independently verified.

Christopher Wright
Senior Analyst at Norges Bank Investment Management (NBIM)

NBIM manages the Norwegian Government Pension Fund Global which owns approximately 2% of European equities.

Key Themes of 2012 Responses

Cutting emissions in a period of economic uncertainty
With the world economy in a fragile state and the threat of renewed financial turmoil yet to recede, many large companies are seeking to bolster their resilience to negative shocks. Nordic 260 firms in particular, while most of them are active globally, remain acutely aware of the precarious situation in their home markets – small, open economies that are heavily dependent on exports, especially to the euro area.

In turbulent times, executives might be tempted to think they can afford to ease up in their efforts to cut greenhouse gas (GHG) emissions, turning attention instead to more immediate concerns. Yet an analysis of this year's Nordic company responses to CDP's questionnaire suggests that emissions reductions should remain high on the agenda, for three main reasons:

- Firstly, in a risky environment firms need to reduce their exposure to risk; if there are sources of risk that they cannot control, it becomes all the more important to focus on those that they can, such as GHG emissions. The next section details the potential financial implications of failing to mitigate such risks.
- Secondly, an economic slowdown is unlikely to provide more than temporary relief from resource constraints. Current uncertainty does nothing to change the expectation that firms will, in the medium term, come under increased pressure from regulators, stakeholders and consumers.
- Thirdly, efforts to control GHG emissions often generate a high and rapid return on investment. In other words, emissions reduction activities may pay for themselves – for example in the form of lower costs for energy or emissions allowances – even within the space of a few years.

Investors are naturally interested not only in the short term but also in companies' longer-term exposure to risks and opportunities linked with climate change. While the Nordic countries have subscribed to relatively ambitious targets for reducing GHG emissions, it is far from clear that they are on track to meet these targets. This suggests – if the stated objectives of national governments and international organisations are seen as credible – that efforts will need to be stepped up.

For example, an 80% fall in domestic emissions over the period 1990–2050 (as shown in Figure 3) implies an average annual reduction of 3.9% for the Nordic countries as a whole. This may be on the high side for companies with substantial activities in countries where official targets are less stringent. Nonetheless, most of the targets reported by Nordic 260 companies fall far short of this level of ambition, although there are notable exceptions (a selection of which is shown in Table 1).

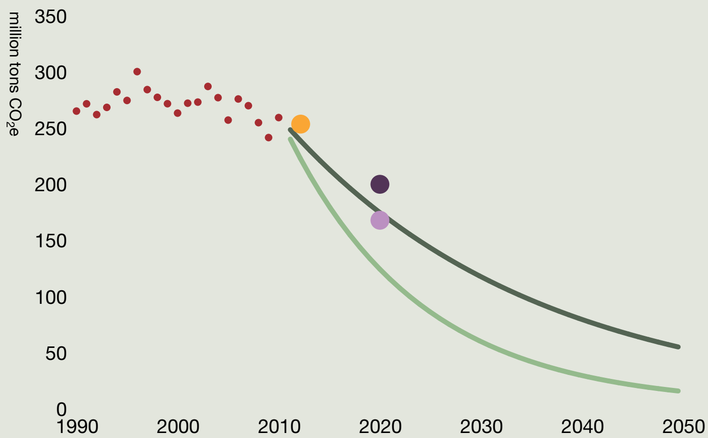
Note: The 'EU 2020' target entails reductions from 2005 to 2020 of 21% for sectors subject to the Emissions Trading System (ETS), and 20%, 16%, and 17% for non-ETS sectors in Denmark, Finland and Sweden respectively. For the 'Tougher EU target if global deal', these factors are converted to base year 1990 and scaled up accordingly.
Source: European Environment Agency for 1990–2010 emissions data (total GHG emissions excluding LULUCF)

GHG emissions in the Nordic region compared with international targets
Figure 1 shows actual total emissions data in the Nordic countries (1990–2010) from the European Environment Agency alongside various international targets. The EU targets (in purple) reflect Denmark, Finland and Sweden's contribution to meeting the EU objective of a 20% cut in emissions by 2020 (or 30% in the event of a satisfactory global climate deal) together with Norway's national commitment to a cut of 30% (or 40% in the event of a global deal).

The IPCC targets (green lines) represent the Intergovernmental Panel on Climate Change's (2007) assessment that developed countries need to reduce emissions by 80–95% by 2050 (compared with 1990) to stand a reasonable chance of limiting further temperature increases to 2°C. The EU Commission in its proposed roadmap for a low-carbon economy by 2050 also targets an 80% reduction in domestic emissions (i.e. actual reductions in the EU, excluding offsets in third countries). The lines show the constant annual percentage decrease that would be needed to meet these goals.

3 **GHG EMISSIONS AND INTERNATIONAL TARGETS FOR DENMARK, FINLAND, NORWAY AND SWEDEN COMBINED**

- Emissions 1990–2010
- Kyoto 2012 target
- EU 2020 target
- Tougher EU target if global deal
- IPCC -80% by 2050 (-3.89% per year)
- IPCC -95% by 2050 (-7.16% per year)



1 SELECTED EMISSIONS REDUCTIONS TARGETS FROM AMONG THE MORE AMBITIOUS NORDIC 260 COMPANY RESPONSES

Company (Sector)	Target specification	Share of Scope 1 and 2 emissions covered	Timescale	Annual rate
Electrolux (Consumer Discretionary)	Reduce Scope 1+2 emissions by 28%	100%	2005–2012	4.6%
Hafslund (Utilities)	Reduce Scope 1+2 emissions per MWh by 70%	90%	2010–2017	12.7–14.1%
Kesko (Consumer Staples)	Reduce Scope 2 emissions by 57%	100%	2005–2016	7.3%
Holmen (Materials)	Reduce Scope 1 emissions by 55%	100%	2005-2020	5.2%
Norwegian Property (Financials)	Reduce Scope 1+2 emissions per m^2 of property by 30%	90%	2011–2015	6.0–6.7%
Novozymes (Materials)	Reduce Scope 1+2 emissions by 30%	100%	2007–2012	6.9%
SEB (Financials)	Reduce Scope 1+2+3 emissions by 45%	100%	2008–2015	8.2%
Storebrand (Financials)	Reduce Scope 1+2+3 emissions by 14%	77%	2010–2012	5.6–7.3%
TDC (Telecommunications Services)	Reduce Scope 1+2+3 emissions by 40%	100%	2010–2020	5.0%
Tieto (Information Technology)	Reduce Scope 1+2+3 emissions by 40%	100%	2009–2013	12.0%

Note: Annual rate is calculated as the constant annual percentage reduction in absolute emissions needed to hit the target. In the case of intensity targets (emissions divided by some unit of output), output is assumed to grow at a rate of 2%. Where targets cover less than 100% of Scope 1 + 2 emissions, non-targeted emissions are assumed to fall by between zero (lower rate) and the same proportion as targeted emissions (higher rate).

Emissions

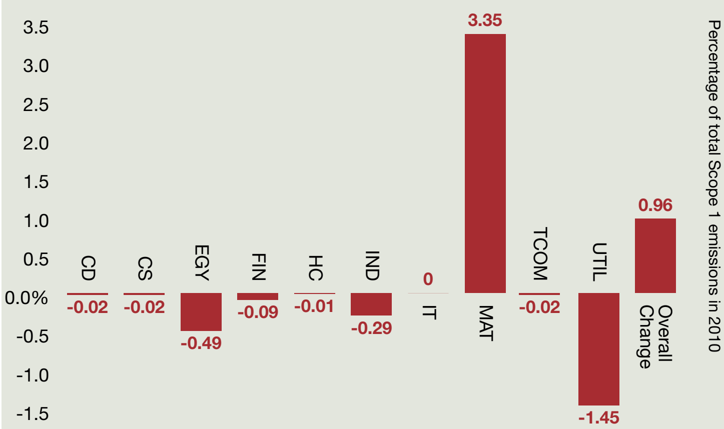
As reported in last year's Nordic 260 report, Nordic companies' global emissions increased in 2010 as the economy bounced back dramatically from a severe recession. Emissions might have been expected to resume a clear downward trend in 2011 as GDP growth slowed down, both in the region itself and globally. However, it is not clear that this has happened. Figure 4 compares Scope 1 emissions in 2011 and 2010 for companies that disclosed for both years. At first sight this suggests a 1% increase in the total.

A closer look at the reasons given by firms suggests that part of the increase is due to boundary changes (greater coverage of a firm's activities in its emissions reporting, which is to be welcomed), while nearly all of the large increase in the Materials sector can be attributed to Norsk Hydro's acquisition of facilities in Brazil. Stripping out these factors would mean a small reduction in total Scope 1 emissions.

Even so, CDP responses suggest that, in the aggregate, emissions reduction activities were once again largely cancelled out by increased output. In most cases (63 out of 81 firms that give at least one of these two reasons), emissions reduction activities outweighed output growth. However, among the remaining 18 companies are a number of large emitters, especially from the Industrials sector.[2] Higher emissions due to output growth at these firms appears to have offset reduction efforts elsewhere.

2: The apparent discrepancy between this finding and the fall in reported emissions for the Industrials sector in Figure 4 may be explained partly by significant net divestment, and partly by some inconsistencies between reported emissions and the (often more approximate) reasons given for changes in emission.

4 CHANGE IN REPORTED SCOPE 1 EMISSIONS 2010–2011

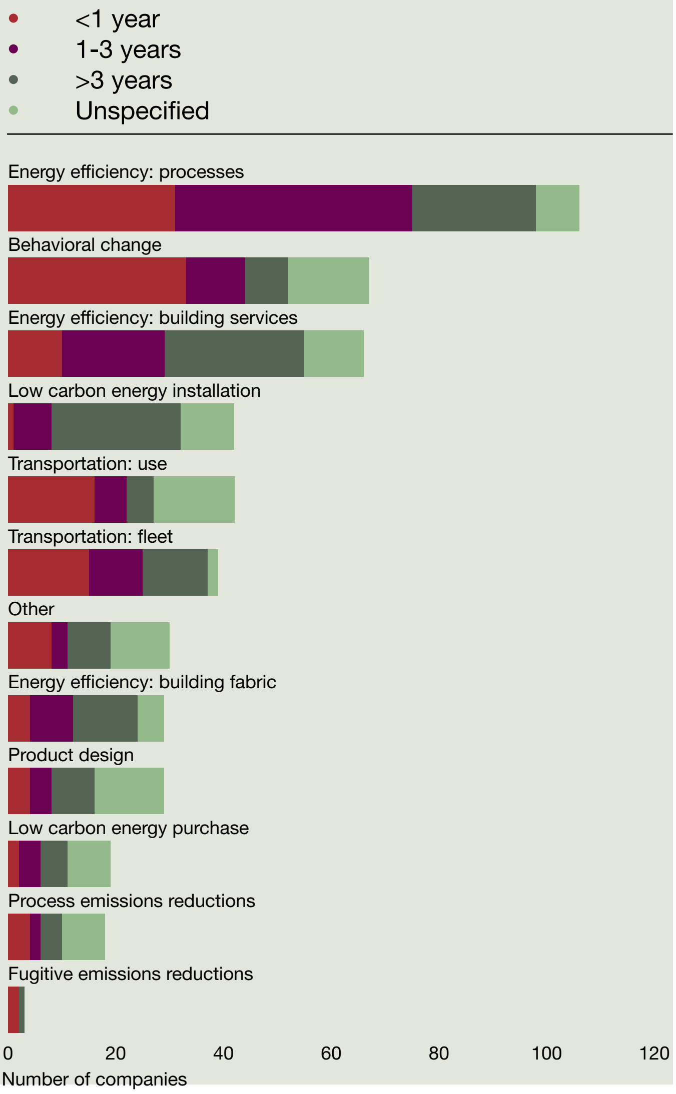


Note: Based on the responses of 127 companies that disclosed Scope 1 emissions in both 2012 and 2011. With a few exceptions, responses relate to the previous calendar year.

Figure 5 shows the different types of emissions reductions initiatives that Nordic 260 companies are pursuing and the period within which firms expect to recoup their investments. At a time when it may make business sense to delay expansions in productive capacity, resources that might otherwise lie idle can be used to promote improvements in energy and fuel efficiency or to design less carbon-intensive products and processes. Particularly in the broad areas of energy efficiency, behavioural change and transport, many initiatives are expected to pay for themselves within a year.

The disclosure of high returns on investment and short payback times suggests that firms, perhaps understandably, are focusing on 'low-hanging fruit'. Many say, for example, that the savings from energy efficiency programmes greatly outweigh the costs even after only a few years. This suggests that there must be scope for additional energy-saving measures that would offer a reasonable rate of return, albeit with a longer investment horizon.

5 **TYPES OF EMISSION REDUCTION INITIATIVES AND PAYBACK TIME**



Emissions control as a risk management strategy

Firms face two main types of risk related to emissions falling under their control (that is, own emissions and to some extent those of suppliers and customers)[3]. Firstly, regulatory developments may affect the cost of carbon allowances, energy, fuel or raw materials, with both direct and indirect effects on profitability. Secondly, the reputation of firms that are not seen by consumers and stakeholders to be playing their part in controlling GHG emissions may be in danger, with negative implications for sales, profit margins, brand value and the cost of capital.

CDP's questionnaire asks companies not only to identify risks and opportunities but also to describe the potential financial implications, the methods they use to manage risks and the costs of such actions.

As far as regulation is concerned, the greatest material risks are borne by firms in sectors that are energy intensive and/or depend directly on fossil fuels: Energy, Industrials (especially the Transportation industry group), Materials and Utilities. Most firms in these sectors cite concerns over emissions trading schemes, carbon taxes, international agreements and/or environmental regulation in general, a common theme being the uncertainty over the future of these arrangements.

Relatively few firms in these sectors disclose the full scale of potential risks (in some cases for stated reasons of confidentiality), although there are some interesting indications. For example:

- Stainless steel producer Outokumpu Oyj estimates a cost of €45 million due the EU Emissions Trading System, assuming a price of €20 per metric ton of CO2e. The firm says that a €10 increase in the carbon price would mean an €18 million increase in costs (compared with sales of just over €5 billion and EBITDA of €80 million in 2011).

- Biotechnology company Novozymes A/S discloses that energy and water account for around 10% of its costs. A price rise of 10% would raise costs by around €5.4 million[4]. In response, the company invested €3.77 million in 2011 to reduce energy and water consumption, with an expected payback time of 1.7 and 3 years respectively.

- Electric utility Fortum Oyj estimates that an increase of €1 in the price of carbon leads to an increase of €0.70–0.80 in the price of electricity per MWh. Fortum sees this as an opportunity since nuclear and renewables account for a substantial share of its generation capacity, but the estimate may indicate the degree of risk faced by large consumers of electricity.

Many firms in other sectors also cite fuel and energy taxes and caps on emissions as significant, though on the whole manageable, risks. In Consumer Discretionary, Alma Media Corporation considers it very likely that fuel and energy prices will rise by 10–15% over the next five years due to regulation. In Consumer Staples, food retailer

Kesko Corporation estimates that a €1 increase in the price of electricity (per MWh) increases its costs by some €750,000 (compared with sales of €9.46 billion in 2011). One concrete measure in response to this has been to install lids on 6.8 km of chest freezers at a cost of around €6.8 million, reducing consumption by 30–40% or around 20 GWh.

Several respondents focus on the EU Emissions Trading System, perhaps because the availability of carbon price forecasts makes risk assessment relatively straightforward (at least on paper). In Health Care, Coloplast A/S estimates additional costs of €0.4–0.5 million based on a carbon price of ca. €25 per metric ton. In Industrials, Metso, a supplier of equipment to the Materials and Energy sectors among others, sees a potential cost increase of €2.3 million if it is included in the ETS, assuming a carbon price of €15 per metric ton. In Materials, metals company Boliden Group is working on the basis of a 'moderate' risk scenario of €17–30 per metric ton. However, with the recent slump in the traded price of allowances (around €8 at the time of writing in September 2012), considerable uncertainty remains over the future operation of ETS. Some respondents use forward contracts and other financial instruments to manage the risk of short-term fluctuations.

Firms in several sectors, particularly Consumer Discretionary and Industrials, cite concerns with product efficiency and product labelling regulations. The risk here involves a small probability of severe consequences: products that fail to meet environmental and energy efficiency standards might be excluded from the market, but firms report considerable efforts to manage this risk by staying ahead of regulatory requirements. The response of household appliance manufacturer Electrolux is typical: failure to meet minimum efficiency performance standards might cost the firm as much as 25–30% of sales of its premium brands, but it devotes substantial resources to ensuring that this is 'exceptionally unlikely'. Similarly, heavy vehicle and engine manufacturer Scania invests 4% of its sales in R&D, of which 60% is focused on engine transmission and fuel efficiency. It also employs two staff and five consultants at a cost approaching €500,000 in order to stay on top of EU legislation.

Overall, the Nordic 260 responses suggest that companies in most sectors do not regard the risks from climate-related regulation as material in the sense that they might jeopardise the survival of the business. This may be gleaned both from qualitative descriptions and from quantitative indications of financial risks where provided; as noted above, even firms in some of the more energy-intensive sectors indicate that the risks from emissions pricing, carbon taxes and so forth are manageable.

Yet firms in sectors with limited exposure to climate change regulation are also making substantial efforts to reduce emissions, which suggests that they must be responding to other drivers. In particular, the most commonly cited driver of risks in the 'other' category (i.e. apart from regulatory and physical) is reputation.

Reputational risks are hard to quantify, so it is not surprising that few respondents are able to specify the potential financial impact. Nevertheless, the available indications are that the potential consequences of a poor reputation may far outweigh those of tougher regulation.

For example:

- Kesko Corporation's increased electricity costs (see above) appear minor in comparison with the impact that a failure to address climate concerns might have on its brand, which is valued at an estimated €344 million. Likewise, Novozymes rates the cost of severe damage to its reputation at over €13 million, and employs a 13-strong sustainability team to counter this risk.

- Elevator maker Kone Oyj says the impact of a loss of reputation could be severe, 'even devastating', which is part of the reason why the company's €82.5 million R&D budget is squarely focused on energy-efficient technology.

- Paper manufacturer SCA notes that 21% of its equity is held by investors who evaluate the company's sustainability performance, meaning that a failure to live up to expectations would lead directly to downward pressure on the share price.

Consumer concerns over sustainability are reflected in the sales figures of several respondents. UPM-Kymmene Corporation, for instance, notes a 4–6% fall in demand in the EU and the US for graphic papers (used for printing reports, magazines, etc.) and discloses a cost of ca. €300 million for mill closures in 2011. Carbon footprinting and sustainable forest management are an important part of the strategy for limiting the risks in this area.

Perception is perhaps as important as reality when it comes to reputation, and many respondents stress communication as a key tool for risk management. But communication on these matters must be transparent and reflect genuine activities; otherwise, as construction company NCC points out, there is the equally serious risk of being exposed for 'greenwashing'.

As noted, CDP Nordic responses show that many firms are already going beyond minimum regulatory requirements in their efforts to cut emissions and improve energy efficiency. At the same time, the question remains whether collectively they are doing enough given the scale of the challenge posed by climate change. Thus the reduction of GHG emissions looks set to remain a key element in risk management strategies, helping firms both to reduce their exposure to tighter regulation and to retain the benefits of a good reputation.

3: The CDP questionnaire also asks companies to report on physical risks associated with climate change. While a firm's own emissions have a negligible impact on these risks, they are highly relevant for risk management in general, even in the Nordic region itself. Please see last year's CDP Nordic report for analysis of these risks.
4: Euro equivalents to figures in Danish krone (approximate where appropriate) are based on conversion at the rate of DKK1 = €0.1343.

Responses, Scores and Leaders

Improvements in disclosure and performance

The number of Nordic companies responding to the CDP information request increased again this year (56% in 2012, 55% in 2011). This modest increase was achieved despite a large turnover in the Nordic 260 company sample in 2012[4] and masks more positive trends. Fourteen companies responded for the first time and voluntary responses were welcomed from a further seven companies which were not part of the Nordic 260 list. Information on all these company responses can be found in the Appendix.

Each year, company responses are reviewed, analysed and scored for the quality of disclosure and performance on actions taken to mitigate climate change. The highest scoring companies for disclosure and/or performance enter the CDLI and the CPLI.

The average disclosure score for all Nordic companies increased to 69 in 2012 (64 in 2011, 60 in 2010). This indicates that the general quality and completeness of company responses has improved once again this year.

There is also an improvement in performance scores and bands. The number of companies achieving a high performance band (A, A- or B) is 23% (18% in 2011) and the average performance score increased 10 points from 2011. These increases are despite a tightening of the scoring methodology for performance and changes to the thresholds for each band.

2 **THE NORDIC 260 CDLI 2012**

Sector	Company Name	Disclosure Score	Consecutive years in the CDLI	Performance Band
Consumer Discretionary	Stockmann	87	1	B
	Electrolux	86	2	B
Consumer Staples	Kesko	88	2	B
	Hakon Invest	83	1	C
Financials	Nordea Bank	91	2	B
Health Care	Novo Nordisk	90	5	B
Industrials	Metso	97	1	B
	Rockwool International	93	3	B
	Finnair	92	1	B
	SAAB	92	5	B
	D/S NORDEN	90	3	B
	Kone	90	2	B
	Outotec	87	4	B
	Scania	83	1	C
Information Technology	Nokia Group	98	4	A
	Tieto	89	2	B
	Atea	86	2	B
Materials	UPM-Kymmene	98	4	B
	Novozymes	94	2	B
	Holmen	91	1	A
	Boliden Group	85	1	B
	Outokumpu	84	3	B
	Stora Enso	84	3	B
	SCA	84	3	B
Telecommunication Services	Elisa	89	1	B
Utilities	Fortum	98	5	B

4: Turbulence on the stock exchange in late 2011 resulted in greater variation than usual in the list of companies included in the Nordic 260 this year since the selection criteria for the Nordic 260 expansion is based on market capitalisation (17% of companies were replaced).

In order to enter the CDLI this year, companies needed a disclosure score of 83 or above (2011: 80). The average disclosure score of the CDLI companies is 90 in 2012 (84 in both 2011 and 2010). These two statistics suggest that the quality of disclosure within the CDLI has increased this year.

Many CDLI companies are demonstrating a long run of consecutive years in the Nordic CDLI including three companies which have featured in the CDLI for all of the last 5 years (Fortum, Novo Nordisk and SAAB).

Geographically Finland is strongly over-represented in the CDLI relative to the overall number of Finnish companies in the Nordic 260 list. Indeed, Finland was also over-represented in the Global 500 CDLI (largest 500 companies worldwide). Norway had the weakest representation in the Nordic CDLI.

3 **THE NORDIC 260 CPLI 2012**

Sector	**Company Name**	**Consecutive years in the CPLI**
Materials	Holmen	1
Information Technology	Nokia Group	1

The criteria to enter the CPLI were raised in 2012 and companies now need to: achieve a performance score of more than 85, score maximum performance points on question 13.1a (absolute emissions performance), and disclose and verify Scope 1 and 2 emissions. Nonetheless, the number of companies achieving this top result increased modestly from one to two in 2012.

Companies in the CPLI typically show a deeper understanding of, and address more pro-actively, the risks and opportunities presented by climate change. They highlight good practices in reporting, governance, verification and emissions reduction activities toward climate change adaptation and mitigation.

More generally, Nordic responders demonstrated improvements in all key performance statistics in 2012 and the number of companies providing verified/assured data increased (see page 17).

"Holmen has a goal to produce renewable electricity to cover 67% of the electricity we consume by 2020. In 2011 the production of renewable electricity was 32%."

Holmen

"The Nokia Solar Charging Project's goal is to answer fundamental questions about how we can charge mobile phones using the renewable energy of solar power, and to find solutions for people in parts of the world where you can't just plug in to an electricity network."

Nokia

For further information on the CDLI and the CPLI and how scores are determined, please visit https://www.cdproject.net/guidance

Scoring Commentary
FirstCarbon Solutions, CDP's scoring partner

The majority of companies responding from the Nordic region recognise the business case for evaluating, reporting and managing issues related to climate change. And of the 145 Nordic companies which submitted a response to the CDP Investor questionnaire in 2012, more than 90% received a disclosure score of 50 or higher which means they provided enough information to also be scored for performance.

Findings across the various disclosure categories of questions provide some interesting insights into areas for further improvement.

Governance and Strategy
92% of Nordic companies include executive oversight in their climate management and while 57% of respondents indicate the use of incentives for management, only 43% provide explanations about the types of incentive programs in use. Likewise, 68% of respondents indicate actively working on climate mitigation procedures and integrating climate change into their strategy planning, and only 29% provide sufficient details surrounding these initiatives to gain maximum points on this question. Maximum points for governance and strategy are achieved with not only executive oversight and incentive programs but with providing details for climate mitigation procedures and planning.

Risk and Opportunities
Risks and opportunities posed a greater challenge for respondents than many other categories of questions. As there are significant points available for these questions, respondents should be diligent to provide a full assessment of their risks or opportunities by identifying the specific plans, projects, or actions related to the risk or opportunity identified. They should also clearly document the costs of the action(s) taken or the revenue benefits expected from the plans, projects or measures implemented. If, after a thorough evaluation, a company determines that it does not have any such risks or opportunities then provision of a full description of the evaluation indicates good risks management policy and is worth significant points.

Emissions management and reporting
Nordic respondents did an excellent job completing the questions regarding Scope 1 and Scope 2 emissions (96% & 95%, respectively). And results were nearly as good for Scope 3 emissions (with 88% describing at least one source of Scope 3 emissions and 72% providing complete information on at least one type of Scope 3 emission). This positively affected the disclosure scoring. Disclosure scoring was generally weaker for the reporting of emissions by geography, businesses, or other breakout categories.

Many companies did not disclose any emission reduction targets (18% reported only absolute targets, 39% reported only intensity targets and 12% reported both). This was an area of weakness for Nordic respondents in 2012 and a key area for improvement in 2013.

Stakeholder Engagement and Verification
A number of issues are included in this category, not the least of which is whether companies publish their climate change policies and performance. Nordic respondents scored well with over 74% publishing their policies or performance in mainstream filings or other external communications. Respondents scored less favorably on external verification of emissions data. Verification is important as it provides the added assurance that reported emissions are accurate. As such, there are significant points available for emission verification. Verification proves challenging for most respondents yet 29% of Nordic companies provided verified data for Scope 1 and/or Scope 2, matching all verification criteria and providing valuable insight for investment communities.

Summary
In 2012 Nordic companies are demonstrating the value of sustainability as well as the strategic importance of addressing the effects of climate change in corporate planning. With over 90% of the companies receiving a performance band, the Nordic region has proven to score well in 2012.

But achieving the maximum score and qualifying for the CDLI and CPLI should be the goal for any organisation submitting to the Carbon Disclosure Project. And it is clear that with some additional attention in the areas of transparency, participation in mitigation activities and emission verification, respondents will have a positive impact on their disclosure and performance results. To score well in performance, it is particularly important to actively measure, verify, manage and reduce emissions.

FirstCarbon Solutions is available to assist companies to improve in these important areas and offers a free 2012 score feedback consultation to Nordic responders. This call will enable benchmarking and provide insights into the strengths and weaknesses in the CDP response.

Congratulations on 2012 and best of luck in 2013!

"In 2012 Nordic companies are demonstrating the value of sustainability as well as the strategic importance of addressing the effects of climate change in corporate planning."

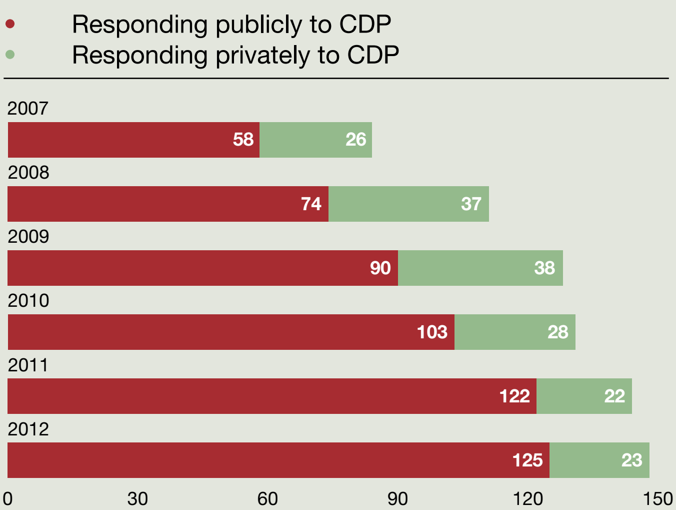
Key Statistics

148 companies responded to the CDP Investor request in 2012. Figure KS1 is based on all these companies, including those that reference a holding company's response. Analysis in the remainder of this report is based on 145 responses received by 1st July 2012 and does not include companies that reference a holding company's response.

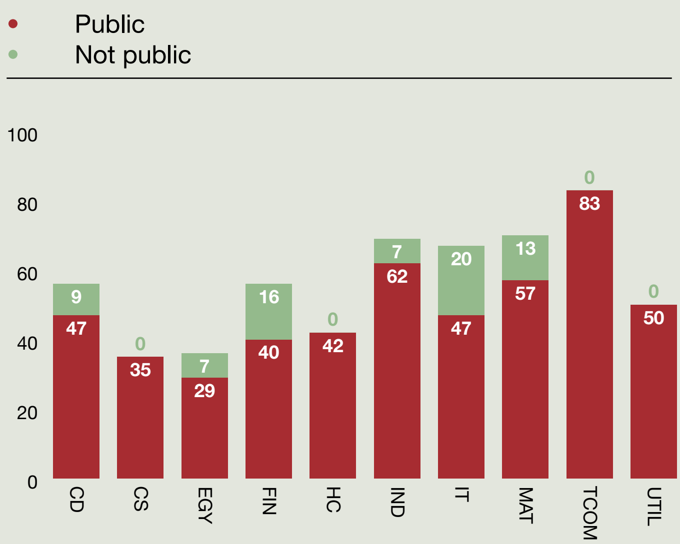
The number of companies disclosing Scope 1 or 2 emissions includes those that have disclosed their emissions as zero. This is a change in approach from previous years.

Climate Change Reporting Framework
The Climate Disclosure Standards Board (CDSB), a special project of CDP, is an international organization committed to the integration of climate change-related information into mainstream corporate reporting. CDSB's internationally accepted Climate Change Reporting Framework is designed for use by companies in making disclosures in, or linked to, their mainstream financial reports about the risks and opportunities that climate change presents to their strategy, financial performance and condition. Designed in line with the objectives of financial reporting and rules on non-financial reporting, the Climate Change Reporting Framework offers a leading example of how to apply the principles of integrated reporting with respect to reporting on climate change.

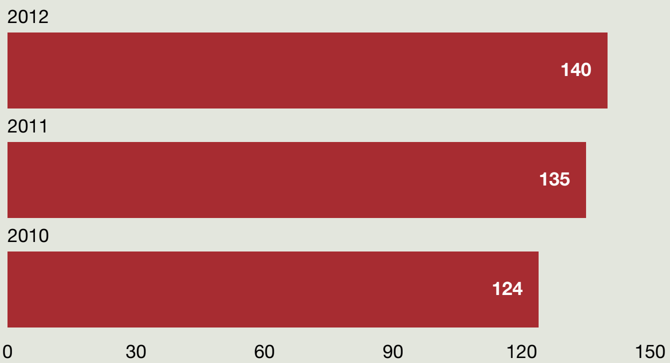
KS1 YEAR ON YEAR NUMBER OF COMPANIES RESPONDING TO CDP PUBLICLY & PRIVATELY



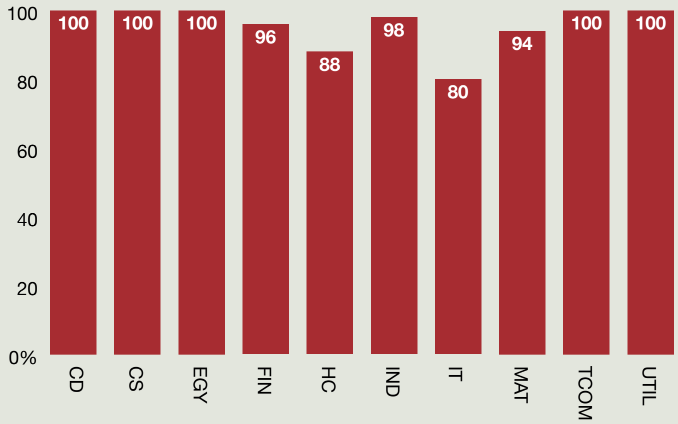
KS2 PERCENTAGE RESPONSE RATE BY SECTOR FOR 2012



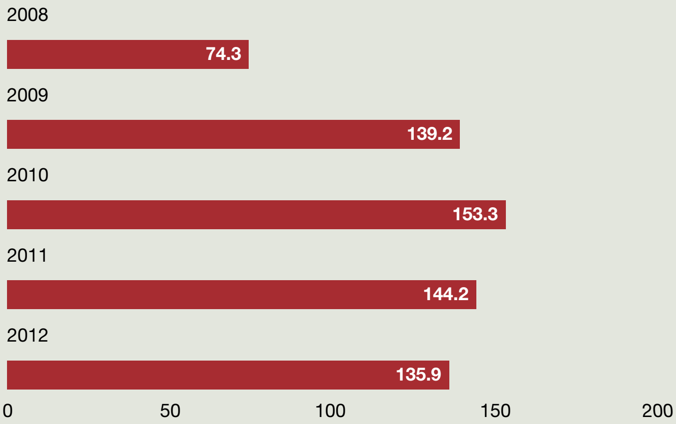
KS3 YEAR ON YEAR NUMBER OF COMPANIES DISCLOSING SCOPE 1 OR SCOPE 2 GHG EMISSIONS



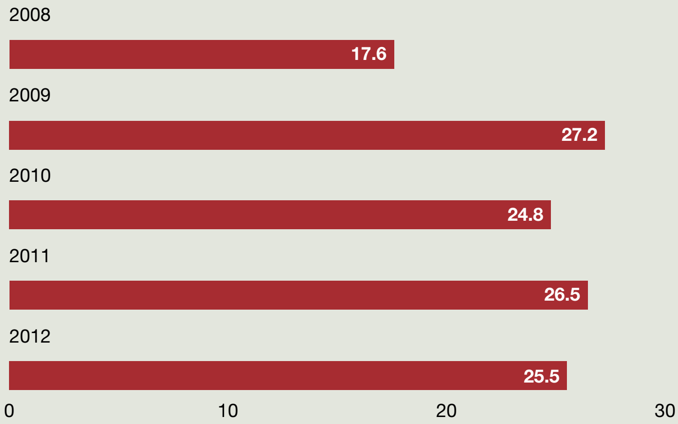
KS4 PERCENTAGE OF RESPONDING COMPANIES IN EACH SECTOR DISCLOSING SCOPE 1 OR SCOPE 2 GHG EMISSIONS



KS5 TOTAL SCOPE 1 EMISSIONS REPORTED BY RESPONDING NORDIC COMPANIES (MILLION tCO_2e)

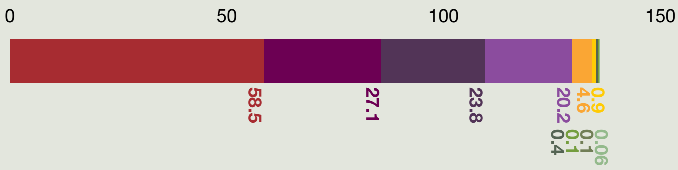


KS6 TOTAL SCOPE 2 EMISSIONS REPORTED BY RESPONDING NORDIC COMPANIES (MILLION tCO_2e)



KS7 TOTAL SCOPE 1 EMISSIONS REPORTED BY RESPONDING NORDIC COMPANIES (MILLION tCO_2e)

- Industrials
- Materials
- Utilities
- Energy
- Consumer Discretionary
- Consumer Staples
- Telecommunication
- Financials
- Health Care
- Information Technology

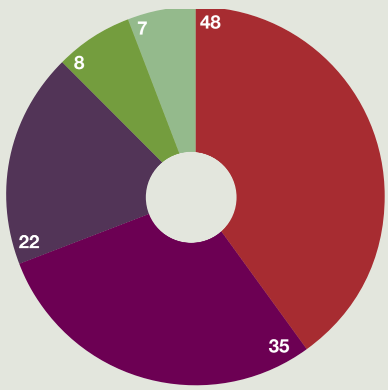


KS8 TOTAL SCOPE 2 EMISSIONS REPORTED BY RESPONDING NORDIC COMPANIES (MILLION tCO_2e)

- Industrials
- Materials
- Utilities
- Energy
- Consumer Discretionary
- Consumer Staples
- Telecommunication
- Financials
- Health Care
- Information Technology

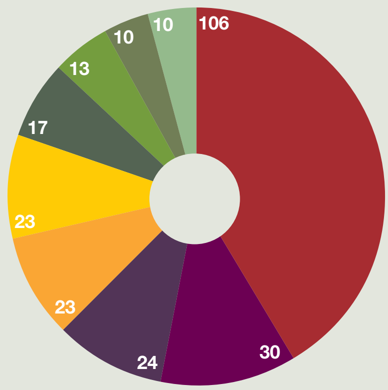
KS9 NUMBER OF SCOPE 3 CATEGORIES REPORTED WITH EMISSIONS DATA

- 1
- 2
- 3
- 4
- 5+



KS10 COMMONLY REPORTED SCOPE 3 CATEGORIES (WITH EMISSIONS DATA PROVIDED)

106	Business travel
30	Downstream transportation & distribution
24	Purchased goods & services
23	Employee commuting
23	Upstream transport & distribution
17	Waste generated in operations
13	Fuel- and energy-related activities
10	Use of sold products
10	Remaining scope 3 categories



Notes on key statistics

Whilst total Scope 1 emissions reported by responding Nordic companies have fallen (KS5) it should be noted that this fall is in part due to a large emitter not responding in 2012.

There has been a change in the way in which Scope 1 and 2 emissions reported under the CCRF are calculated although this is not expected to cause a major change in reported emissions. In 2011 the Scope 1 and 2 figure was taken as Parent and subsidiaries under control of the parent whereas in 2012 joint ventures are also included.

Only companies reporting Scope 3 emissions using the Greenhouse Gas Protocol Scope 3 Standard named categories have been included below.

Whilst in some cases "Other upstream" or "Other downstream" are legitimate selections, in most circumstances the data contained in these categories should be allocated to one of the named categories. Reporting companies are encouraged to use these specific categories where appropriate as not doing so and using "Other" greatly affects data quality and therefore the utility of the data for investors. An attempt to subjectively attribute categories where companies have selected "Other" has not been undertaken. In addition, only those categories for which emissions figures have been provided have been included.

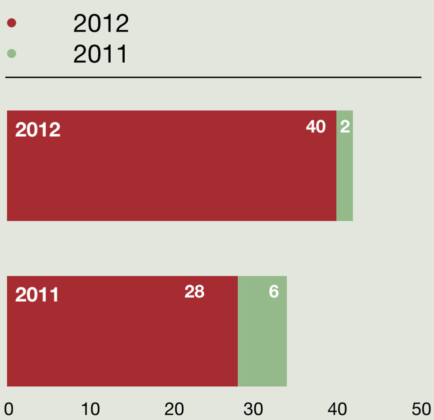
Scope 3 data has only been included for 2012 due to changes in Scope 3 categories occurring between the 2011 and 2012 reporting cycles as a result of the publication of the Greenhouse Gas Protocol Scope 3 Standard.

CDP has been working to encourage greater levels of third party verification/assurance of data in response to demands for higher levels of data quality. This led to a change in the way in which verification/assurance was reported and scored in 2011. Therefore only data for 2011 and 2012 for verification/assurance is included here. The term "reported and approved" refers to the fact that the number of companies with verification is based on the scoring of the verification statements attached to their response. Where companies report verification/assurance of more than one scope, they are only counted once in the statistic provided below.

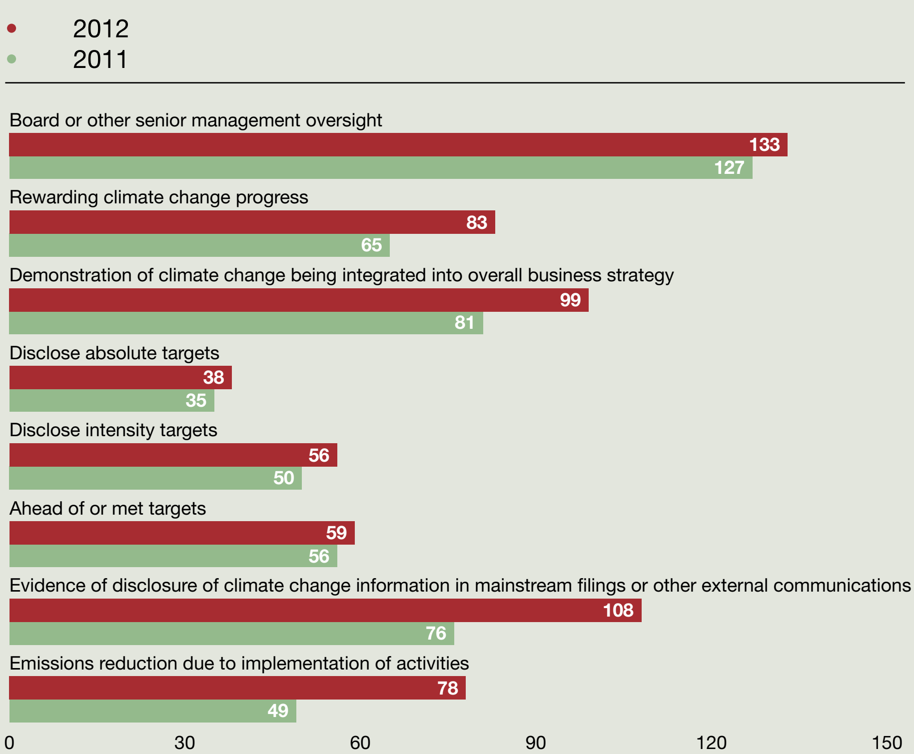
Companies disclosing absolute or intensity targets have only been included in this section where they have been fully described, providing base year, target year, percentage reduction and for intensity targets, target metric.

Companies may report multiple emissions reductions due to implementation of activities, targets and reward incentives. In all of these cases, companies are only counted once in the statistics presented below, with the exception of the statistics on absolute and intensity targets where companies that have both types of target will be counted once in each type.

KS11 VERIFICATION/ASSURANCE OF EMISSIONS COMPLETE OR UNDERWAY AND FULL POINTS AWARDED (ANY SCOPE) 2011-2012



KS12 KEY PERFORMANCE STATISTICS 2011-2012



Appendix

Please refer to the Key on page 23 for further explanation of the abbreviations used

Company Name	Country[a]	Sector[b]	2012 Score[c]	2011 response status[d]	Scope 1[e]	Scope 2[e]	Number of Scope 3 categories reported[f]	Target(s) reported[g]
A.P. Moller - Maersk	Dk	IND	80 C	AQ	40,393,000	666,000		Int
Aarhuskarlshamn	Se	CS	DP	NR	DP	DP	DP	DP
Addtech	Se	IND	NR	X	NR	NR	NR	NR
ÅF	Se	IND	75 D	AQ	0	1,852	1	Int
AF Gruppen	No	IND	NR	X	NR	NR	NR	NR
AGR Group	No	EGY	NR	X	NR	NR	NR	NR
Ahlstrom	Fi	MAT	63 C	AQ	614,454	287,503	1	Int
Aker	No	EGY	IN	DP	IN	IN	IN	IN
Aker Solutions	No	EGY	DP	DP	DP	DP	DP	DP
Aktia Bank	Fi	FIN	NR	NR	NR	NR	NR	NR
Alfa Laval Group	Se	IND	DP	DP	DP	DP	DP	DP
Algeta	No	HC	DP	DP	DP	DP	DP	DP
Alk-Abello	Dk	HC	DP	NR	DP	DP	DP	DP
Alliance Oil Company	Se	EGY	NR	NR	NR	NR	NR	NR
Alma Media	Fi	CD	79 C	AQ	640	5,000	1	Abs, Int
Ambu AS	Dk	HC	DP	NR	DP	DP	DP	DP
Amer Sports	Fi	CD	54 E	AQ	11,700	18,796	3	
Archer	No	EGY	NR	X	NR	NR	NR	NR
Arendals Fossekompani	No	UTIL	NR	NR	NR	NR	NR	NR
Assa Abloy	Se	IND	38	AQ	68,300	180,305		Int
Atea	No	IT	86 B	AQ	5,328	4,764	2	Int
Atlas Copco	Se	IND	76 D	AQ	28,179	97,822	1	Abs, Int
Atrium Ljungberg	Se	FIN	66 E	AQ	NP	NP	NP	NP
Auriga Industries	Dk	MAT	23	AQ	71,000			Abs
Austevoll Seafood	No	CS	NR	NR	NR	NR	NR	NR
Autoliv	Se	CD	DP	DP	DP	DP	DP	DP
Avanza Bank Holding	Se	FIN	NR	NR	NR	NR	NR	NR
Avocet Mining	UK	MAT	DP	X	DP	DP	DP	DP
Axfood	Se	CS	62 D	AQ	10,455	26,822	1	Abs, Int
Axis Communications	Se	IT	DP	DP	DP	DP	DP	DP
Bakkafrost	Dk	CS	NR	DP	NR	NR	NR	NR
Bang & Olufsen	Dk	IT	67 D	AQ	2,450	6,069	1	Int
Beijer Alma	Se	IND	NR	NR	NR	NR	NR	NR
Betsson	Se	CD	NR	NR	NR	NR	NR	NR
Bilia	Se	CD	NR	X	NR	NR	NR	NR
Billerud	Se	MAT	NR	NR	NR	NR	NR	NR
BioGaia	Se	HC	NR	X	NR	NR	NR	NR
Boliden Group	Se	MAT	85 B	AQ	542,580	425,101		Abs
Bonheur	No	EGY	NR	NR	NR	NR	NR	NR
Brinova Fastigheter	Se	FIN	DP	X	DP	DP	DP	DP
BW Offshore	No	EGY	NR	DP	NR	NR	NR	NR
Cargotec	Fi	IND	60 E	AQ	NP	NP	NP	NP
Carlsberg Breweries	Dk	CS	69 C	AQ	670,247	305,560	1	Int
Castellum	Se	FIN	53 D	AQ	2,958	15,199		Int
CDON Group	Se	CD	NR	X	NR	NR	NR	NR
Cermaq	No	CS	74 C	AQ	66,022	19,962	1	Int
Chr. Hansen Holding	Dk	MAT	59 D	AQ	17,953	43,682	1	Int
Citycon	Fi	FIN	60 D	AQ	189	68,562	3	Abs, Int
Clas Ohlson	Se	CD	70 E	AQ	219	3,464	3	Int
Coloplast	Dk	HC	72 C	AQ	10,857	45,027	4	Int
Copeinca	No	CS	NR	X	NR	NR	NR	NR
Copenhagen Airports	Dk	IND	58 C	AQ	4,945	25,736	1	Abs

Company Name	Country[a]	Sector[b]	2012 Score[c]	2011 response status[d]	Scope 1[e]	Scope 2[e]	Number of Scope 3 categories reported[f]	Target(s) reported[g]
Cramo	Fi	IND	DP	X	DP	DP	DP	DP
D/S NORDEN	Dk	IND	90 B	AQ	726,718	451	3	Abs
Danske Bank	Dk	FIN	66 C	AQ	4,505	33,829	2	Abs, Int
Det Norske Oljeselskap	No	EGY	27	X	15,000	0		
DFDS	Dk	IND	DP	NR	DP	DP	DP	DP
Diös Fastigheter	Se	FIN	NR	X	NR	NR	NR	NR
DNB	No	FIN	68 E	AQ	1,292	10,300	2	Int
DNO International	No	EGY	76 D	AQ	272,061	141	2	
DOF	No	EGY	60 E	AQ	NP	NP	NP	NP
DSV	Dk	IND	55 E	AQ	3,284,052	51,470		Int
Duni	Se	CD	DP	X	DP	DP	DP	DP
Ekornes	No	CD	82 B	AQ	1,332	2,320	2	
Electrolux	Se	CD	86 B	AQ	95,074	248,205	2	Abs
Electromagnetic Geoservices	No	EGY	NR	X	NR	NR	NR	NR
Elekta	Se	HC	78 B	AQ	2,975	5,537	2	Int
Elisa	Fi	TCOM	89 B	AQ	162	87,875	2	Int
Ericsson	Se	IT	74 C	AQ	31,835	227,764	9	Int
EVRY	No	IT	78 D	NR	386	12,636	1	
Fabege	Se	FIN	DP	DP	DP	DP	DP	DP
Fagerhult	Se	IND	DP	X	DP	DP	DP	DP
Farstad Shipping	No	EGY	NR	NR	NR	NR	NR	NR
Fastighets AB Balder	Se	FIN	NR	X	NR	NR	NR	NR
FastPartner	Se	FIN	NR	X	NR	NR	NR	NR
Fenix Outdoor	Se	CD	49	X	NP	NP	NP	NP
Finnair	Fi	IND	92 B	AQ	2,525,284	24,920	1	Int
Finnlines	Fi	IND	DP	X	DP	DP	DP	DP
Fiskars Corporation	Fi	CD	30	NR	NP	NP	NP	NP
FLSmidth & Co.	Dk	IND	75 D	AQ	23,034	55,909	1	
Fortum	Fi	UTIL	98 B	AQ	23,700,000	206,000	3	Int
Fred. Olsen Energy	No	EGY	DP	NR	DP	DP	DP	DP
Frontline Ltd	No	IND	73 C	AQ	NP	NP	NP	NP
F-Secure	Fi	IT	8	NR	NP	NP	NP	NP
G & L Beijer	Dk	IND	NR	X	NR	NR	NR	NR
Ganger Rolf	No	EGY	NR	NR	NR	NR	NR	NR
Genmab	Dk	HC	19	AQ				
Getinge	Se	HC	68 C	AQ	17,173	22,280	1	Int
Gjensidige Forsikring	No	FIN	59 C	X	365	1,538	1	Abs
GN Store Nord	Dk	HC	NR	NR	NR	NR	NR	NR
Golar LNG Limited	No	EGY	NR	X	NR	NR	NR	NR
Greentech Energy Systems	Dk	UTIL	NR	X	NR	NR	NR	NR
H&M Hennes & Mauritz	Se	CD	61 D	AQ	19,188	325,003	2	Int
Hafslund	No	UTIL	64 C	AQ	105,696	57,160	1	Int
Hakon Invest	Se	CS	83 C	AQ	67,907	239,168	1	Abs
HEBA Fastighets	Se	FIN	NR	X	NR	NR	NR	NR
Hexagon	Se	IND	DP	DP	DP	DP	DP	DP
Hexpol	Se	CD	51 E	AQ	16,505	82,568		
HKScan	Fi	CS	NR	NR	NR	NR	NR	NR
Höegh LNG Holdings	No	EGY	NR	X	NR	NR	NR	NR
Höganäs	Se	MAT	IN	IN	IN	IN	IN	IN
Holmen	Se	MAT	91 A	AQ	258,350	209,900	5	Abs
Hufvudstaden	Se	FIN	92 B	AQ	NP	NP	NP	NP
Huhtamäki	Fi	MAT	28	AQ	NP	NP	NP	NP

Company Name	Country[a]	Sector[b]	2012 Score[c]	2011 response status[d]	Scope 1[e]	Scope 2[e]	Number of Scope 3 categories reported[f]	Target(s) reported[g]
Husqvarna	Se	CD	67 E	AQ	NP	NP	NP	NP
IC Companys	Dk	CD	DP	NR	DP	DP	DP	DP
Industrial & Financial Systems	Se	IT	17	X	NP	NP	NP	NP
Industrivärden	Se	FIN	66 E	AQ	0	32	4	
Indutrade	Se	IND	NR	DP	NR	NR	NR	NR
Intrum Justitia	Se	IND	NR	NR	NR	NR	NR	NR
Investment AB Kinnevik	Se	FIN	58 D	AQ	95,111	6,126	1	Int
Investment AB Latour	Se	FIN	NR	NR	NR	NR	NR	NR
Investment AB Öresund	Se	FIN	NR	NR	NR	NR	NR	NR
Investor	Se	FIN	79 C	AQ	21	124	2	
Jeudan	Dk	FIN	NR	NR	NR	NR	NR	NR
JM	Se	IND	78 B	AQ	4,583	2,356	5	Abs
Jyske Bank	Dk	FIN	NR	NR	NR	NR	NR	NR
Kemira	Fi	MAT	72 C	AQ	162,700	1,083,000	1	
Kesko	Fi	CS	88 B	AQ	40,809	134,814	3	Abs, Int
Klövern	Se	FIN	NR	NR	NR	NR	NR	NR
Kone	Fi	IND	90 B	AQ	101,900	32,000	3	Int
Konecranes	Fi	IND	62 D	AQ	NP	NP	NP	NP
Kongsberg Gruppen	No	IND	62 D	AQ	1,775	7,994	1	Int
Kungsleden	Se	FIN	74 D	AQ	44	8,517	1	Int
Kvaerner	No	EGY	NR	X	NR	NR	NR	NR
Lassila & Tikanoja	Fi	IND	54 D	AQ	41,811	6,849	4	Abs
Lemminkainen Group	Fi	IND	80 E	AQ	84,900	5,900	1	
Lerøy Seafood Group	No	CS	DP	NR	DP	DP	DP	DP
Lindab	Se	IND	67 C	AQ	11,895	22,118	2	Int
Loomis	Se	IND	NR	NR	NR	NR	NR	NR
Lundbeck	Dk	HC	78 D	AQ	9,478	24,636	5	Abs
Lundbergs	Se	FIN	NR	NR	NR	NR	NR	NR
Lundin Petroleum	Se	EGY	72 D	AQ	85,073	2,887	2	
Marine Harvest Group	No	CS	DP	AQ	DP	DP	DP	DP
Meda	Se	HC	73 C	AQ	12,854	9,006	3	Int
Medivir	Se	HC	NR	X	NR	NR	NR	NR
Mekonomen	Se	CD	NR	DP	NR	NR	NR	NR
Melker Schörling	Se	FIN	7	AQ	NP	NP	NP	NP
Metsä Board	Fi	MAT	77 C	AQ	681,461	484,062	2	Int
Metso	Fi	IND	97 B	AQ	74,358	197,679	1	Abs, Int
Millicom International Cellular	Se	TCOM	68 D	AQ	100,019	108,721	1	Int
Modern Times Group MTG	Se	CD	81 B	AQ	151	5,031	3	Int
NCC	Se	IND	78 C	AQ	191,191	25,345	2	Abs
Neste Oil	Fi	EGY	79 C	AQ	3,724,398	162,500	3	Int
Net Entertainment NE	Se	IT	NR	X	NR	NR	NR	NR
NIBE Industrier	Se	IND	DP	DP	DP	DP	DP	DP
NKT Holding	Dk	IND	67 D	AQ	20,620	98,086	2	Int
Nobia	Se	CD	66 D	AQ	36,933	24,495	3	
Nokia Group	Fi	IT	98 A	AQ	18,600	251,800	5	Abs, Int
Nokian Tyres	Fi	CD	32	IN	103,000	63,700		
Nordea Bank	Se	FIN	91 B	AQ	34	50,199	1	Int
Nordic Mines	Se	MAT	NR	X	NR	NR	NR	NR
Nordic Semiconductor	No	IT	64 E	NR	NP	NP	NP	NP
Nordnet	Se	FIN	55 D	AQ	1	214	2	
Norsk Hydro	No	MAT	53 D	AQ	9,498,610	5,437,156		Int
Northern Offshore Ltd	Bm	EGY	NR	X	NR	NR	NR	NR

Company Name	Country[a]	Sector[b]	2012 Score[c]	2011 response status[d]	Scope 1[e]	Scope 2[e]	Number of Scope 3 categories reported[f]	Target(s) reported[g]
Northland Resources S.A	Se	MAT	NR	X	NR	NR	NR	NR
Norwegian Air Shuttle	No	IND	DP	NR	DP	DP	DP	DP
Norwegian Property	No	FIN	64 D	NR	256	29,114	2	Int
Novo Nordisk	Dk	HC	90 B	AQ	41,354	55,372	3	Abs
Novozymes	Dk	MAT	94 B	AQ	47,899	321,853	3	Abs, Int
O P Pohjola Group	Fi	FIN	56 E	NR	NP	NP	NP	NP
Odfjell SE	No	IND	68 D	AQ	1,738,791	13,559	6	Int
Olav Thon Eiendomsselskap	No	FIN	NR	NR	NR	NR	NR	NR
Olvi	Fi	CS	DP	X	DP	DP	DP	DP
Opera Software	No	IT	NR	NR	NR	NR	NR	NR
ORC Group	Se	IT	NR	X	NR	NR	NR	NR
Oriflame Cosmetics	Se	CS	68 C	AQ	10,373	24,311	4	Int
Oriola-KD	Fi	HC	NR	NR	NR	NR	NR	NR
Orion	Fi	HC	DP	AQ	DP	DP	DP	DP
Orkla	No	IND	70 D	AQ	643,810	577,740		
Össur hf.	Is	HC	NR	NR	NR	NR	NR	NR
Outokumpu	Fi	MAT	84 B	AQ	817,785	645,946	2	Abs, Int
Outotec	Fi	IND	87 B	AQ	2,841	8,323	2	Abs, Int
Pandora	Dk	CD	DP	DP	DP	DP	DP	DP
Peab	Se	IND	81 C	AQ	828,207	5,417	2	
Petroleum Geo-Services	No	EGY	66 D	AQ	409,495	13,067	1	
PKC Group	Fi	IND	5	X				
Pöyry Plc	Fi	IND	68 E	DP	0	2,984	1	
Pronova BioPharma	No	HC	NR	DP	NR	NR	NR	NR
Prosafe	Cy	EGY	55 D	AQ	69,802	0		
Raisio	Fi	CS	NR	NR	NR	NR	NR	NR
Ramirent	Fi	IND	NR	NR	NR	NR	NR	NR
Rapala VMC	Fi	CD	NR	X	NR	NR	NR	NR
Ratos	Se	FIN	DP	AQ	DP	DP	DP	DP
Rautaruukki	Fi	MAT	70 C	AQ	NP	NP	NP	NP
REC Group	No	IND	81 B	DP	211,424	462,328	2	Int
Rezidor Hotel Group	Be	CD	DP	NR	DP	DP	DP	DP
Rieber & Son	No	CS	NR	X	NR	NR	NR	NR
Rockwool International	Dk	IND	93 B	AQ	1,111,390	308,145	2	Int
Royal Caribbean Cruises	USA	CD	61 C	AQ	4,290,865	974	2	Int
Royal Unibrew	Dk	CS	DP	DP	DP	DP	DP	DP
SAAB	Se	IND	92 B	AQ	14,566	24,469	3	Int
Salmar	No	CS	DP	AQ	DP	DP	DP	DP
Sampo	Fi	FIN	NR	NR	NR	NR	NR	NR
Sandvik	Se	IND	57 E	AQ	241,794	295,756	1	Int
Sanoma	Fi	CD	DP	AQ	DP	DP	DP	DP
SAS	Se	IND	69 D	AQ	3,872,463	41,334	1	Abs, Int
SCA	Se	MAT	84 B	AQ	2,483,000	1,688,000	2	Int
Scania	Se	IND	83 C	AQ	32,264	46,842	1	
Schibsted	No	CD	70 D	AQ	1,786	5,523	1	
Schouw & Co	Dk	FIN	NR	NR	NR	NR	NR	NR
Seadrill Management	No	EGY	55 E	AQ	NP	NP	NP	NP
SEB	Se	FIN	80 B	AQ	0	11,120	4	Abs
Seco Tools (see Sandvik)	Se	IND	AQ(SA)	DP			AQ(SA)	AQ(SA)
Securitas	Se	IND	77 D	AQ	74,236	14,869	1	Int
Siem Offshore	No	EGY	NR	X	NR	NR	NR	NR
SimCorp	Dk	IT	NR	NR	NR	NR	NR	NR

Company Name	Country[a]	Sector[b]	2012 Score[c]	2011 response status[d]	Scope 1[e]	Scope 2[e]	Number of Scope 3 categories reported[f]	Target(s) reported[g]
Skanska	Se	IND	82 C	AQ	436,406	76,096	3	
SKF	Se	IND	79 B	AQ	63,973	615,407	2	Abs, Int
Skistar	Se	CD	NR	DP	NR	NR	NR	NR
Solar AS	Dk	IND	59 E	AQ	3,970	7,462	1	
Solstad Offshore	No	EGY	71 C	AQ	457,638	174	2	Int
Songa Offshore	No	EGY	DP	DP	DP	DP	DP	DP
Sponda Plc	Fi	FIN	40	NR	NP	NP	NP	NP
SSAB	Se	MAT	DP	AQ	DP	DP	DP	DP
Statoil	No	EGY	75 C	AQ	14,347,351	462,838	1	
Statoil Fuel and Retail (see Statoil)	No	CD	AQ(SA)	X			AQ(SA)	AQ(SA)
Stockmann	Fi	CD	87 B	AQ	608	28,566	1	
Stolt-Nielsen	UK	IND	NR	DP	NR	NR	NR	NR
Stora Enso	Fi	MAT	84 B	AQ	2,967,000	1,850,000	3	Int
Storebrand	No	FIN	82 B	AQ	331	733	2	Abs, Int
Subsea 7	No	IND	DP	DP	DP	DP	DP	DP
Svenska Handelsbanken	Se	FIN	71 C	AQ	NP	NP	NP	NP
Sweco	Se	IND	NR	DP	NR	NR	NR	NR
Swedbank	Se	FIN	77 C	AQ	4,400	41,474	4	Abs
Swedish Match	Se	CS	63 E	AQ	12,158	27,444	2	
Swedish Orphan Biovitrum	Se	HC	NR	NR	NR	NR	NR	NR
Sydbank	Dk	FIN	NR	NR	NR	NR	NR	NR
Systemair	Se	IND	DP	NR	DP	DP	DP	DP
TDC	Dk	TCOM	65 C	AQ	15,396	125,698	1	Abs
Tele2	Se	TCOM	IN	AQ	IN	IN	IN	IN
Telenor Group	No	TCOM	76 C	AQ	283,480	816,205	2	Int
TeliaSonera	Se	TCOM	69 D	AQ	39,370	228,355	3	Int
TGS-NOPEC Geophysical Company	No	EGY	NR	NR	NR	NR	NR	NR
Tieto	Fi	IT	89 B	AQ	39	28,955	1	Abs
Tikkurila	Fi	MAT	DP	X	DP	DP	DP	DP
Tivoli AS	Dk	CD	NR	NR	NR	NR	NR	NR
Tomra Systems	No	IND	70 C	AQ	26,600	3,800	2	Int
Topdanmark	Dk	FIN	65 C	AQ	1,906	3,644	1	Abs
Trelleborg	Se	IND	74 C	AQ	110,040	275,311	1	Int
Tryg	Dk	FIN	82 B	AQ	1,358	1,916	1	Abs
Unibet Group	Mt	CD	57 E	DP	73	577	1	
United International Enterprises Limited	Dk	CS	NR	DP	NR	NR	NR	NR
UPM-Kymmene	Fi	MAT	98 B	AQ	4,658,000	3,085,000	4	Int
Uponor	Fi	IND	73 C	AQ	NP	NP	NP	NP
Vacon	Fi	IND	50 E	IN		1,156		Abs
Vaisala	Fi	IT	74 C	AQ	3,889	4,889	1	Abs
Veidekke	No	IND	72 C	AQ	71,259	21,257	2	Int
Vestas Wind Systems	Dk	IND	78 C	AQ	58,444	90,472	4	Int
Viking Line	Fi	CD	DP	NR	DP	DP	DP	DP
Volvo	Se	IND	56 D	AQ	NP	NP	NP	NP
Vostok Nafta Investment	Bm	FIN	DP	X	DP	DP	DP	DP
Wallenstam	Se	FIN	74 C	AQ	NP	NP	NP	NP
Wärtsilä Corporation	Fi	IND	75 C	AQ	68,897	56,610	1	Abs
Wihlborgs Fastigheter	Se	FIN	68 D	AQ	336	9,362	3	Abs
Wilh. Wilhelmsen	No	IND	IN	IN	IN	IN	IN	IN
William Demant Holding	Dk	HC	55 E	AQ	736	9,455		
Yara International	No	MAT	AQ(L)	DP	AQ(L)	AQ(L)	AQ(L)	AQ(L)
Yit	Fi	IND	72 D	NR	16,400	10,200		

KEY TO APPENDIX

a **Be** Belgium
Bm Bermuda
Ca Canada
Cy Cyprus
Dk Denmark
Fi Finland
Is Iceland
Mt Malta
Se Sweden
UK United Kingdom

b **CD** Consumer Discretionary
CS Consumer Staples
EGY Energy
FIN Financials
HC Health Care
IND Industrials
IT Information Technology
MAT Materials
TCOM Telecommunications
UTIL Utilities

CDP would like to recognise other Nordic companies which provided responses to the 2012 Investor CDP information request, either voluntarily or as part of another sample:

ABB (Switzerland)
AstraZeneca (UK)
Eltek (Norway)
Gunnebo (Sweden)
KLP Insurance (Norway)
SOL Pesulapalvelut (Finland)
TORM (Denmark)

CDP would also like to recognise the Nordic companies which responded publicly to the CDP Supply Chain information request:

Beirholms (Denmark)
Danfoss (Denmark)
Elanders (Sweden)
Grundfos (Denmark)
KMC (Denmark)
Komatsu Forest (Sweden)
Ojala Group (Finland)
Swep (Sweden)

c The 2012 score is comprised of the disclosure score number and performance score letter. Only companies that have scored 50 or more for their disclosure score are given a performance score. Companies that have not responded have the relevant response status code in this column. See the key for c below.

d **AQ** Answered Questionnaire
AQ(L) Answered Questionnaire Late (after analysis cut off date of July 1, 2012)
DP Declined to Participate
IN Provided Information
NR Not Responded
NP Non Public
SA See Another
X Not requested to respond in 2011

e Emissions in metric tonnes CO_2e

f Only Scope 3 categories reported using the Greenhouse Gas Protocol Scope 3 named categories (as provided in the Online Response System) are included when determining the number of categories reported. Companies that have reported one or more additional categories of “Other upstream” and/or “Other downstream” are indicated with an asterisk (*). Where companies have not provided emissions data or where they have not reported a named Scope 3 category according to the GHG Protocol Scope 3 standard, this column is blank.

g **Abs** Absolute target,
Int Intensity target, based on entering a value for “% reduction from base year”

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This report and all of the public responses from corporations are available for download from www.cdproject.net

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