Investing in gender equality 3.0

- Are Norwegian asset managers stepping up?

pwc care® finans FORBUNDET

Contents

Preface

CARE, Finansforbundet and PwC share a joint ambition to promote the social dimension of sustainability towards authorities, companies and in the public debate and we believe that gender equality is a cornerstone in building social sustainability. Gender equality is a goal in itself, but it is also key for reaching the other sustainability goals.

We know that promoting gender equality is a driver for corporate performance[1]. Gender equality enhances a company's ability to attract top candidates from a larger talent pool, and to retain these candidates, inclusive policies and programs that support career advancement are essential. Companies must cultivate environments where diverse talent can thrive, contributing to long-term success and sustainability.

We also believe that the consumer's powers are increasingly defined by assuring that private savings are spent in a sustainable and socially conscious way.
Based on this, we published a report in 2022, "Investing in gender equality 2.0" – comparing gender equality performance in Norwegian asset managers' investment decisions. The report found varying degrees of engagement in gender equality.
The report concluded that although gender equality was on most of the asset managers' agendas, their investments did not necessarily reflect this.

This year's report reveals that gender equality is increasingly seen as integral to ethical and responsible investment. Despite progress seen in integrating gender equality in investment criteria over the last three years, challenges remain, particularly in markets with historically low female representation. There is also a notable stagnation in many markets due to the recent American backtracking on Diversity, Equity and Inclusion (DEI). The report explores how Norwegian asset managers analyze the current situation and what their responses might be as their portfolios are under pressure from two angles: having to comply with EU standards of DEI and other social requirements, and at the same time being required to remove DEI initiatives to be able to continue business with central US entities.

The commitment to gender equality seems to remain strong among Norwegian asset managers. We hope this commitment will stand firm despite political challenges, as asset managers can play a vital role in keeping gender equality on the agenda through active portfolio management and development of more investment products that support gender equality. Looking to the future, asset managers in Europe and Norway are well positioned to advance DEI initiatives. Commitment to gender equality and inclusive practices is underpinned by robust frameworks and cultural values, and we trust that these will not be watered down in spite of external pressure.

Oslo, June 10th, 2025

Kaj-Martin Georgsen, Secretary General, CARE Norway
Vigdis Mathisen, President, Finansforbundet (FSU Norway)
Gøril Hyni, Partner, PwC Norway

[1]Storebrand, CARE, PwC 2019: Investing in equality

01

Introduction

01 Introduction

Gender equality is both a matter of basic human rights and economic development. Women constitute 49.7% of the world's population[2] and could evidently play a much larger role in economic development than what is currently the case. Norway ranks third on the most gender-equal countries in the world[3], but gender disparities still exist. In 2024, only 17.5% of the CEOs in Norway's 200 largest companies were women.

Gender equality is a matter of creating sustainable, safe and prosperous communities. According to the World Bank, growing evidence shows that removing gender barriers can unlock economic productivity, reduce poverty, deepen social cohesion and enhance well-being and prosperity for current and future generations[4]. Still, the World Economic Forum estimates that with current rates of improvement, **full gender parity will only be reached in 133 years,** or around the year 2158[5]. With the recent political developments that counter gender equality, we fear that gender parity will take even longer.

A World Bank study across 141 countries estimates the loss in human capital wealth due to gender inequality at $160.2 trillion[6]. This is about twice the value of GDP globally. Companies with more gender-diverse leadership demonstrate a stronger commitment to inclusive growth, broader stakeholder focus, and good Environmental, Social and Governance (ESG) related practices. These contribute to better financial performance, reduced business risk, greater resilience, and enhanced sustainability.[7]

Companies with gender diversity in leadership outperform their less diverse peers. The World Economic Forum published an article by the CEO of Merck in 2017[8], pointing to a broad research base which confirms that on average, the financial advantages of gender equality and diversity are:

- A 48% higher operating return
- A 42% higher return on sales
- A 45% higher earnings per share

By investing in companies that either score well on gender equality measures or actively contribute to the gender equality agenda, the gender gap could be closed sooner and yield better results over time. In other words, gender equality pays off!

[2]Statistics Times. (n.d.). World sex ratio. Retrieved May 15, 2025.
[3]World Population Review. (n.d.). Gender equality by country. Retrieved May 15, 2025.
[4]The World Bank. (2024, October 15). Gender overview.
[5]World Economic Forum. (2024, June). Global gender gap 2024: What to know.
[6]World Bank. (2018, May). The cost of gender inequality: Unrealized potential – The high cost of gender inequality in earnings.
[7]World Bank. (2023, June). Increasing women's representation in business leadership.
[8]World Economic Forum. (2019, April). Gender diversity makes great business sense.

The eight Norwegian asset managers this report is based on.

Our 2022 report found that Norwegian asset managers to a varying degree included gender equality as part of their portfolio management. Although gender equality was on most of the asset managers' agendas, their investments did not necessarily reflect this concern.

In this year's report, we follow up with the eight major Norwegian asset management firms from the 2022 report: DNB Asset Management, Nordea Asset Management, Danske Invest, KLP Asset Management, Storebrand Asset Management, Handelsbanken Fonder, Eika Asset Management, and Odin Management. All firms were given the opportunity to participate in interviews, and we conducted five semi-structured in-depth interviews in total. These interviews, along with a document review, were conducted between February and May of 2025. In addition, we have supplemented our findings with a document analysis of investment guidelines. We examine developments in three of the parameters assessed in the 2022 report:

- **Gender equality in investment criteria**
- **Gender equality in voting guidelines**
- **Gender equality in investment products**

The current global political climate can hardly be overlooked when discussing gender equality and diversity. Since the Trump administration came to power in January 2025, we have witnessed a significant push-back of the whole DEI agenda, where the US government now requires a scale-back of all initiatives aimed at specific demographic groups, and DEI initiatives are systematically banned or cancelled. These measures are not only affecting domestic entities in the US, as both international corporations and US embassies abroad have been instructed to comply. This setback for gender equality may thus have far reaching consequences if left unchallenged.

Gender equality in voting guidelines

Gender equality in investment criteria

Gender equality in investment products

02

Key Parameters for 2025

02 Key Parameters for 2025

Gender equality has emerged as a key factor in driving both social progress and financial performance, and Norwegian asset managers are increasingly recognizing the value of integrating gender considerations into their investment strategies.

This part of the report explores the strides made by selected Norwegian asset managers[9] towards gender equality in 2025, building on key pillars from the 2022 report and comparing the status quo. By examining three key areas of development, we show if and how gender equality is reflected in investment criteria, voting guidelines, and product offerings. The findings from our interviews reveal that gender equality is increasingly seen as integral to ethical and responsible investment, marking a positive change over the past three years. However, the current political climate is now threatening to dismantle these achievements, making it critical for asset managers to stay committed, tackle emerging challenges, and push for policies that uphold diversity, equity, and inclusion in sustainable investing. This chapter is based on the interviews conducted with five of the Norwegian asset managers and the document reviews.

> Gender equality is increasingly seen as integral to ethical and responsible investment, marking a positive change over the past three years.

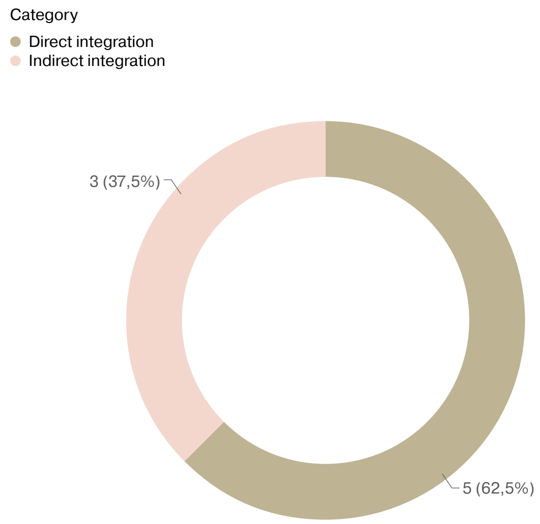
[9]DNB Asset Management, Nordea Asset Management, Danske Invest, KLP Asset Management, Storebrand Asset Management, Handelsbanken Fonder, Eika Asset Management, and Odin Management.

02.1 Gender Equality in Investment Criteria

The asset managers we have interviewed have integrated gender equality into their core investment strategies through ethical guidelines, ESG analysis, and clearly defined investment criteria – standards used to evaluate and select investments.

In total, five out of eight explicitly integrate gender equality into their ethical guidelines and investment criteria for responsible investments. The remaining three address this indirectly through ESG goals.

Integration of Gender Equality in Investment Strategies



Four of the eight asset managers we interviewed have implemented exclusion criteria to avoid investments in companies that systematically discriminate against women, aligning with broader ESG goals. This represents clear progress compared to 2022, when the report indicated that none of the asset managers had explicit guidelines including gender equality in their exclusion criteria. Among the remaining four, three make vague references to adhering to specific ESG criteria and good governance principles, which emphasize accountability, transparency, and fairness in decision-making, while one provides a list of general exclusion criteria that does not explicitly address gender equality. However, the vagueness of some of these guidelines makes it difficult to hold them accountable, as their commitments are not explicitly defined.

Overall, we have observed a tightening of guidelines and an increased reliance on gender-focused screening methods among the asset managers we have interviewed. Gender-focused screening methods involve evaluating companies based on their policies, practices, and performance related to gender equality. Improved data has informed more nuanced decision-making, allowing asset managers to better assess companies' commitments to gender equality and track progress over time. Some of the asset managers we spoke to have expanded their geographical focus to include companies in emerging markets to promote gender balance. For instance, KLP informed us that they have identified opportunities to support positive developments through investing in Saudi Arabia, a country that has historically been difficult to engage with due to differing views on human rights and gender equality. Before entering the market, KLP conducted a thorough screening and enhanced due diligence of the relevant companies included in the Morgan Stanley Capital International (MSCI) Emerging Market Index and engaged with major funds and shareholders to assess their commitment to gender equality in listed companies. KLP notes that companies are now setting concrete goals to increase female representation and tracking their progress. They have also worked with policymakers, explaining that in emerging markets, signals from authorities are often stronger drivers for change than dialogue from shareholders.

> Asset managers are increasingly excluding companies that discriminate against women — a clear shift since 2022.

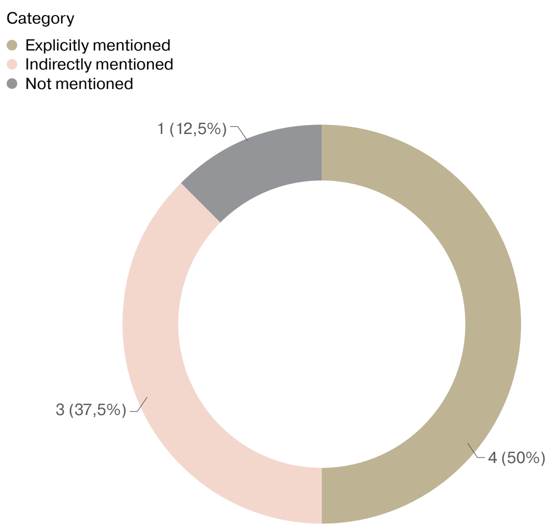
Investments in these markets might lead to ripple effects in favor of gender equality, both within companies and in the broader markets. For example, increased female representation in leadership positions can inspire cultural shifts and encourage other companies to adopt similar practices, ultimately benefiting local communities. This serves as a concrete example of how Norwegian asset managers can leverage consumer capital to support women and promote gender equality, even in markets that have traditionally been challenging.

By pursuing ethical investments in emerging markets and increasing reliance on gender-focused screening methods, several asset managers are now contributing to efforts to increase female representation in ways that were previously not possible. However, while these developments represent meaningful progress, they remain vulnerable and susceptible to external pressures, including political and data-related challenges. This is further discussed below.

Despite progress being made in integrating gender equality in investment criteria, challenges remain, particularly in markets with historically low female representation. Three of the five asset managers we interviewed have also observed stagnation, citing the current political climate and the American rollback of DEI initiatives as key factors. We have been informed that several data providers allegedly have stopped providing analysis on diversity due to these political changes, posing a dilemma for asset managers who have previously relied on the data as a vital ESG tool. With fewer data points to underpin good decision making, it is increasingly challenging to assess gender equality components. Despite this rollback, two of the interviewed asset managers specifically emphasized that they make it a priority to continuously update their expectation documents and policies, ensuring they stay aligned with their commitment to gender equality.

In 2022, gender equality was not necessarily a qualifying factor for investments, with asset managers using limited indicators to assess gender diversity. By 2025, there has been a shift towards a more comprehensive integration of gender equality within investment criteria. Asset managers increasingly appear to adopt exclusion criteria to avoid investing in companies that discriminate against women, reflecting a more proactive approach than in the past. However, some of these exclusion criteria remain vague, making it difficult to hold them accountable for their commitments. While enhanced data from analysis providers has made it easier for asset managers to ensure responsible investing and decision-making in recent years, the rollback of DEI initiatives is now challenging this development, underscoring the fragility of progress in these markets. This serves as a reminder that, despite progress, the integration of gender equality in investment strategies remains vulnerable to external pressures. See more in chapter 3.1.

Exclusion Criteria on Gender Equality



02.2 Gender Equality in Voting Guidelines

The Norwegian asset managers we have spoken to have increasingly incorporated gender equality into their voting guidelines, that guide shareholder voting decisions, reflecting a commitment to promoting diversity in boards. This integration is seen as a key factor in driving systemic change within companies and ensuring that gender balance is prioritized in corporate governance.

Voting guidelines across firms now commonly include explicit expectations for board diversity. The EU Gender Balance on Corporate Boards Directive, valid from the end of 2024, sets a target for large EU listed companies of 40% of the underrepresented sex among their non-executive directors, and 33% among all directors[10]. These guidelines are designed to ensure that boards reflect a diverse range of perspectives, enhancing decision-making and company performance. The focus also often extends beyond gender to include age, competence, and ethnicity, promoting a holistic approach to diversity.

The asset managers reported that they actively participate in nomination committees and exercise their voting rights to influence board composition. This enables them to voice dissatisfaction when progress on gender diversity falls short and to advocate for meaningful change. By engaging directly with companies, they can set clear expectations and encourage the implementation of diversity goals.

Since 2022, there has been a trend of increasing the gender balance in boards, with many companies setting targets for female representation. The new European regulations have reinforced these efforts, providing a supportive framework for asset managers to advocate for diversity within companies. In Norway, a long-standing requirement mandates that public limited companies (ASA) must have at least 40% women on their boards, a pioneering measure introduced in 2008 that has set a strong precedent for gender equality in corporate governance[11]. This regulatory backing, both at the national and European levels, may have empowered firms to engage more effectively with companies and drive improvements in gender representation.

While the commitment to gender equality in boards is strong in general, the implementation of voting guidelines varies by region. In Western countries, the requirement for gender representation has increased, while in Asian markets, efforts are often focused on ensuring that at least one woman is present on boards. These regional differences highlight the need for tailored approaches that consider local cultural and regulatory contexts.

All the eight asset managers maintain their focus on influencing company behavior through active ownership, with an increased emphasis on gender equality in their voting guidelines since 2022. This demonstrates progress since 2022, when the report indicated that only four out of eight asset managers considered gender equality in their voting guidelines.

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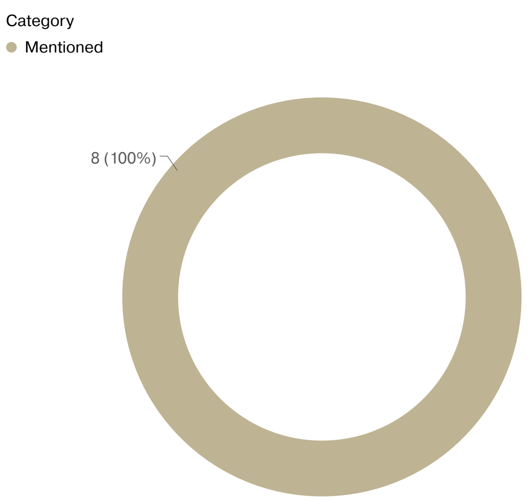
[10] European Commission. (2025, January 3). New EU rules to improve gender balance in corporate boards enter into application.
[11] Norwegian Public Limited Liability Companies Act (Allmennaksjeloven) § 6-11a. (2006). Gender representation on boards.

By 2025, there is a clear shift towards setting explicit expectations for board diversity, with many firms globally requiring at least 40% representation of underrepresented genders. This change reflects a more structured approach to promoting gender balance at the board level. Asset managers actively participate in nomination committees and use voting rights to drive change, supported by new European regulations. This proactive engagement contrasts with the earlier, less formalized efforts to impact gender diversity through voting, highlighting a more strategic focus on board composition and diversity.

Integration of Gender Equality in Voting Guidelines



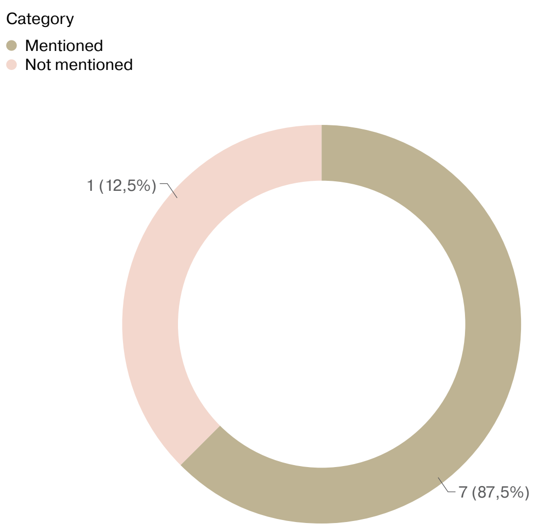
02.3 Gender Equality in Investment Products

The Norwegian asset managers have made advances in integrating gender equality into their existing ESG investment products and financial instruments, reflecting a broader commitment to sustainable and responsible investing. Through this integration, they are ensuring that such considerations are part of the overall investment decision-making process. It aligns investment strategies with social values and can drive positive change in the corporate world.

Seven out of eight asset managers have gender equality integrated across their responsible investment products. By comparison, the 2022 report indicated that only three out of eight mentioned gender equality in their investment products. Nordea stands out in the Norwegian market for having developed a *specific fund focusing on diversity and gender equality*. This product is designed to attract investors who prioritize diversity and gender equality as ethical considerations alongside financial returns. Having such a clearly marked product makes it easier for the socially conscious consumer to navigate among funds and invest their money in companies and entities where gender equality is promoted and stimulated.[12]

While all of the asset managers we researched offer sustainability funds, the marketing of these products is primarily focused on climate and environmental issues. This approach risks overshadowing other important aspects of the sustainability agenda, such as gender equality. This creates a gap in visibility for gender-focused investment products, potentially reducing their appeal to socially conscious investors.

Integration of Gender Equality Across Investment Products



[12]Nordea. (2022, March). Flere er opptatt av bærekraftig sparing: Økende interesse for likestillingsfond [More people are interested in sustainable saving: Growing interest in gender equality funds].

The Global Diversity Engagement Fund:

Nordea offers a tailored fund focusing on companies that actively promote gender equality both in boardrooms and executive leadership. The Global Diversity Engagement Fund, launched on International Women's Day, March 8, 2019, has achieved a return of over 100% in its first five years of operation. The fund invests in companies that not only meet defined sustainability goals but also prioritize equal career opportunities and have high female representation in leadership positions.[13]

> **Gender equality must move beyond box-ticking to become a genuine strategic priority in responsible investing.**

Four out of the five asset managers express that they are adopting a holistic approach to integrating gender equality across all their investment products. While this is perceived as a positive development since 2022 and indicates that progress has been made, challenges remain in ensuring gender equality is not just a box-ticking exercise but a genuine strategic priority. Asset managers should focus on identifying firms with authentic strategies for gender equality, setting clear goals and collecting data to evaluate goal achievement. This approach supports ethical investing and positions firms to capitalize on the benefits of diverse and inclusive business practices, aligning financial strategies with social values.

The 2022 report highlighted that most funds had limited integration of gender equality as a parameter in investment products, but rather focused on broader ESG goals. By 2025, asset managers have embedded more specific gender equality criteria into their products. Three of the asset managers now use multi-factor stock screening and sustainability assessments as part of their investment processes. Multi-factor stock screening analyzes stocks based on multiple factors, such as financial performance, risk, and sustainability criteria, while sustainability assessments, as part of ESG analysis, evaluate companies' performance on sustainability metrics. This shift indicates a strategic effort to align investment products with social values and meet investor demand for ethical considerations. Hopefully, this reflects a growing recognition of gender equality as a core component of responsible investing, moving beyond the generalized approaches of the past.

[13] DN. (2024, March). Dobling for likestillingsfond: Mer enn bare å telle damer i styrer [Doubling for the gender equality fund: More than just counting women on boards]. DN.no.

03

Impact of Recent Political Developments

03.1 American DEI Backtracking

In 2025, President Donald Trump issued Executive Order 14151, "Ending Radical and Wasteful Government DEI Programs and Preferencing,"[14] marking a significant shift in U.S. policy. This order prohibits DEI initiatives across federal agencies and directs the government to combat such practices in the private sector.

The order therefore also impacts private organizations and companies. Big companies such as Walmart, McDonalds, Meta, Google, Ford, Amazon, Goldman Sachs and Bank of America were quick to publicly distance themselves from DEI initiatives. This reflects broader political trends that may reshape global business practices, as companies worldwide who do business with US federal entities now have begun to reassess their commitments to DEI.

A large multinational consultant firm with US origins confirmed already in February 2025 that it will sunset its global DEI goals and programs this year as a direct result of the sudden change in the US operating landscape[15]. It is already scaling back initiatives aimed at specific demographic groups - programs once essential for fostering gender balance and combating discrimination. This may also directly and indirectly affect employees in Norway.

By April 2025, international newspapers disclosed that several suppliers of goods and services worldwide had received letters from their respective American embassies, scrutinizing their practices regarding female representation, anti-racism measures, and sexual diversity. Non-compliance with American DEI restrictions could result in losing business with the American government entities. Companies are under pressure to align with these expectations and avoid having DEI programs as part of their strategies. Hafslund Celcio, Norway's largest supplier of district heating (including to the American embassy in Oslo), has already announced that they were not willing to sacrifice their core values to comply[16]. But this resistance is not an obvious alternative for all. Many companies are now pulled between EU requirements where diversity measures are embedded in many regulations, and US requirements, where DEI is a disqualification criterion. In Denmark, companies are already struggling to navigate this landscape, altering their websites with language that reduces the emphasis on diversity-related terms while at the same time trying to uphold EU requirements for diversity and inclusion.[17]

European companies delivering services or goods to the American market, operate in a complex landscape. Balancing the risk of losing US business while maintaining their commitment to compliance with local and European standards and consumer expectations is a delicate yet necessary exercise.

Several of the asset managers we interviewed, observed positive trends in emerging markets, particularly in regions traditionally dominated by male leadership. Highlighting positive initiatives is crucial to understanding their extensive benefits and ensuring continued progress. In Asia, countries like Japan are setting new requirements for female representation on boards, reflecting a growing commitment to gender diversity. Despite concerns that political shifts may threaten these advancements, asset managers remain committed to continuing their work on inclusion of DEI criteria.

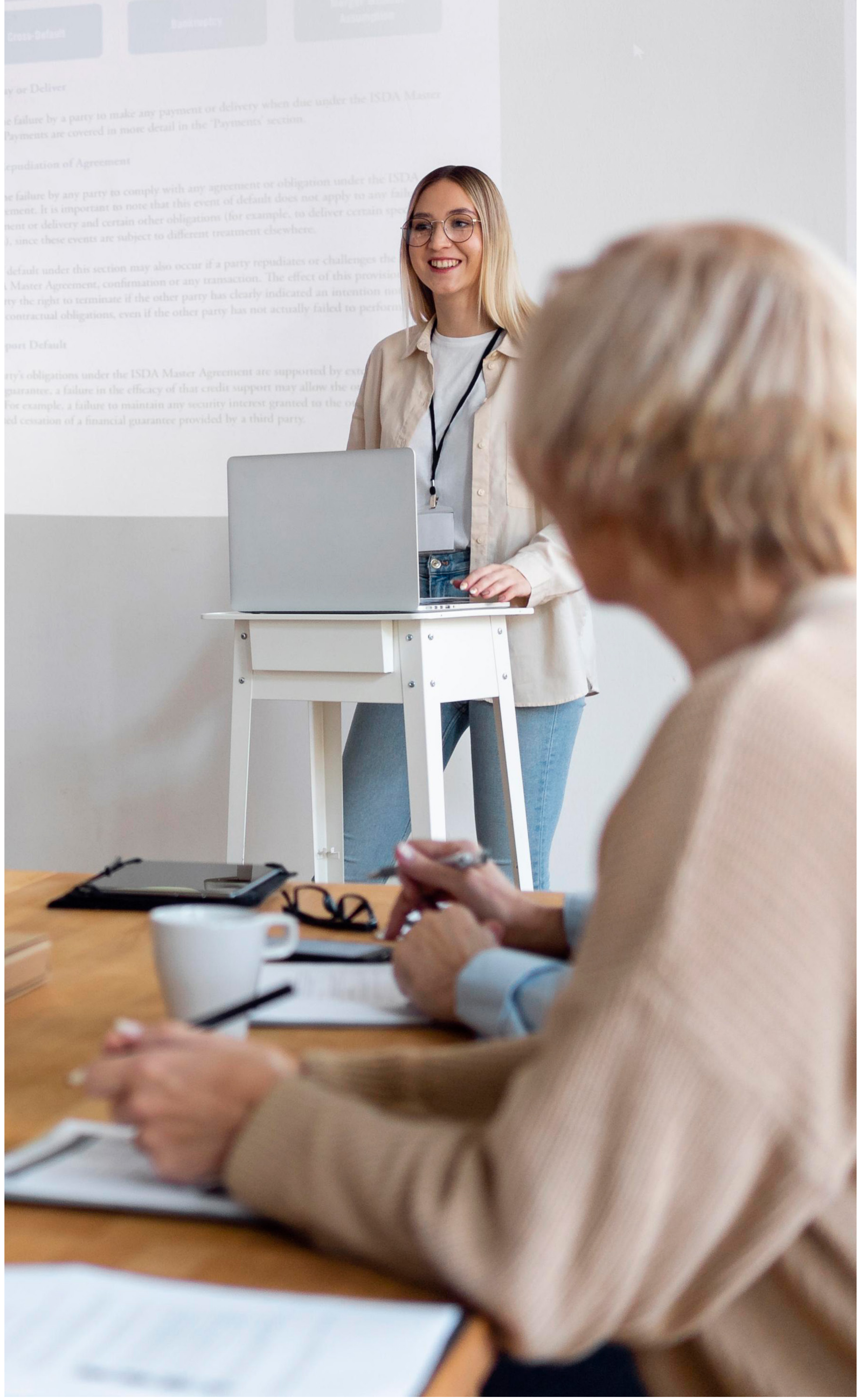
Progress has also been observed in countries like Saudi Arabia, where asset managers are now engaging with companies to establish concrete goals for increasing female representation. However, while positive trends are evident in regions like Asia and the Middle East, where more women are taking seats on boards and in leadership positions, asset managers also acknowledge that global political developments, such as the recent backtracking in the United States, could pose challenges to the positive steps being made towards gender equality.

The current political shifts pose significant challenges to gender equality efforts, not only in the US but globally. The rollback of DEI initiatives in a major economy like the US risks undermining progress and influencing other regions to deprioritize diversity measures. This creates a ripple effect that threatens to erode advancements in corporate and societal gender equality. The political clampdown on DEI raises critical questions about the future of these efforts within global corporations, especially as businesses navigate conflicting regulatory landscapes between the US and the EU. **Asset managers have a vital role to play in ensuring that gender equality remains a priority, encouraging companies to integrate inclusion and diversity as core elements of sustainable business practices.**

> **Companies are now pulled between EU requirements where diversity measures are embedded in many regulations, and US requirements, where DEI is a disqualification criterion.**

> **Asset managers have a vital role to play in ensuring that gender equality remains a priority, encouraging companies to integrate inclusion and diversity as core elements of sustainable business practices.**

[14] The White House. (2025, January). Ending illegal discrimination and restoring merit-based opportunity.
[15] Financial Times. (2025, February). Accenture ditches diversity and inclusion goals.
[16] VG. (2025, April). Hafslund trosser Trump: – Dette er verdier vi ikke er villig til å endre *[Hafslund defies Trump: – These are values we are not willing to change]*.
[17] Nettavisen. (2025, April 2). Amerikansk forbud mot europeisk likestilling [American ban on European equality]. Nettavisen.



03.2 Corporate Responses

Asset managers report a growing demand for responsible investments, emphasizing transparency and accountability. As managers of savings, they are obligated to align with European and Norwegian standards, including DEI. Following recent political developments, they experience increased demands from clients for assurance about their investments, driving asset managers to engage with businesses and enhance reporting mechanisms, committing to robust DEI goals. Some of the interviewed asset managers note that this shift will reveal which businesses genuinely care about DEI versus those who have previously used it as a publicity tool, to position themselves in the market. Some also predict that companies may adopt dual reporting standards to effectively navigate varying market requirements. This approach aims to mitigate risk while protecting corporate reputation and stakeholder trust.

In Denmark, asset managers observe a trend of changing language, with firms modifying communication strategies to reduce emphasis on diversity-related terms. This adjustment seeks to balance compliance with the American market while maintaining DEI efforts to meet European stakeholder expectations. Notably, some companies that seem to have scaled back are continuing their DEI efforts under new labels such as “resilience”. This suggests that compliance with American guidelines does not necessarily prevent DEI work. However, some argue that this approach is harmful to the cause, as it restricts the use of descriptive terms and undermines the importance of the work.

While some companies have started to scale back DEI initiatives following the political pressures, others have intensified their commitment. In many ways, this clarifies which businesses are genuinely invested in DEI and which mainly engage for compliance or investor satisfaction. Although there is a risk of losing American business, asset managers and stakeholders wield influence through voting and exclusions in their portfolio. They actively voice their opinions and work towards these goals.

> **A firm commitment to DEI is not only a moral imperative—it’s a strategic asset for innovation, resilience, and stakeholder trust.**

Looking to the future, Europe and Norway are well positioned to advance their DEI initiatives. A firm commitment to gender equality and inclusive practices is underpinned by robust frameworks and cultural values. Many asset managers are deeply engaged with their investment objects, ensuring DEI remains a priority, particularly in leadership and board representation. This proactive approach from the asset managers, as observed in our recent interviews, underscores the belief in diversity as a catalyst for innovation and resilience.

04

Findings

04 Findings

In 2022, when our previous mapping was conducted, there was a general perception that the world was moving in the right direction, with political signals, laws, and regulations providing support for the cause. However, the findings also revealed that progress was moving too slowly, and significant work remained to be done to fully integrate gender equality into financial practices. While there was optimism about the trajectory, it was clear that more concrete actions and commitments were needed to accelerate gender equality efforts. Since then, a lot of positive developments have occurred in the financial sector, but this progress might be endangered by the recent DEI backtracking.

Since 2022, Norwegian asset managers have generally developed better integration of gender equality in their **investment criteria**, recognizing diversity as a driver of value and performance and as a cornerstone for responsible investing. Specific criteria for exclusion are often in place, for instance, to avoid investing in companies that discriminate against women. Despite progress seen in integrating gender equality in investment criteria, challenges remain, particularly in markets with historically low female representation. This poses a dilemma, as many of these markets are in dire need of investments to stimulate economic growth and create employment opportunities (also for women), so being too quick to exclude investees may be counterproductive in the long-term. Asset managers must therefore carefully assess where and when the best is the enemy of the good, and handle investment criteria with care.

As for **voting guidelines**, asset managers are now incorporating gender equality in a more systematic way than in 2022. Voting guidelines across firms now commonly include explicit expectations for board diversity. This is a key step in driving systemic change within companies and ensuring that gender balance is prioritized in corporate governance. All the asset managers we spoke to underline their active ownership: by engaging directly with companies, they can set clear expectations and encourage the adoption of diversity goals. This is partly driven by EU regulations and shows a proactive engagement that contrasts with the earlier, less formalized efforts. While the commitment to gender equality is strong, the implementation of voting guidelines varies by region and these differences highlight the need for tailored approaches that consider local cultural and regulatory contexts. Here, asset managers must also assess where and when the best is the enemy of the good, ensuring that their voting guidelines strike a balance between driving progress and respecting local conditions.

When it comes to gender equality in **investments products**, we observe that more specific gender equality parameters have been added since 2022. All of the asset managers we researched have some sort of sustainability funds, but the marketing of these is mostly focused on climate and environment, and not the broader sustainability agenda. Gender equality criteria have been embedded into these products using multi-factor stock screening and sustainability assessments. This indicates a strategic effort to align investment products with social values and meet investor demand for ethical considerations.

More specialized funds for investments in gender equality are, however, missing. Such investment products could have reflected a growing recognition of gender equality as a core component of responsible investing, *moving beyond the generalized approaches of the past*. We would welcome more bold moves from asset managers in terms of creating investment products that can be easily recognized by consumers as contributing to social issues in general and gender equality more specifically.

When it comes to the current political climate and consequent challenges, several Norwegian asset managers have expressed concern over the U.S backtracking on DEI initiatives. Several have noted that many U.S. companies are scaling back public DEI commitments while continuing efforts internally under rebranded terms, challenging the importance of **transparency and accountability in advancing diversity goals**. They view this rollback as a significant setback in progress on diversity and inclusion. Despite these challenges, however, Norwegian asset managers remain committed to DEI principles, emphasizing the importance of diversity for ethical and sustainable investments.

> Gender equality is no longer just a moral issue — it's a cornerstone of responsible investing. The time has come for bolder moves, clearer commitments, and investment products that make gender impact visible.

05

Conclusion and Recommendations

05 Conclusion and Recommendations

In the three years that have passed since the previous report was published, we have seen progress in many important areas and gender equality seems to be more systematically mainstreamed as an ethical practice in portfolio management. As of June 2025, however, the global political outlook for gender equality looks quite different to what it did only a few months ago. The Trump administration's order to dismantle and prohibit DEI initiatives and directing federal agencies to combat such practices also in the private sector, has put a lot of pressure on the corporate sector and many companies feel forced to comply in fear of losing essential business. This political clamp-down on DEI raises critical questions about the future of DEI efforts within global corporations and thus poses a threat to organizational culture and inclusive internationally.

European and Norwegian companies could now be essential in promoting and *protecting* gender equality and inclusivity through their policies and practices. Not only because diversity and equality are ethical values that should be upheld – but also *because it makes commercial sense*[18]. The path forward will however require careful navigation of political pressure and volatility as well as regulatory complexities. Asset managers have an important role to play in ensuring that gender equality remains on the agenda, even in troubled political times. Maintaining requirements for gender balance and continuing a close follow up of investees on equality matters will help ensure that companies stay true to their commitment and ensure sustainable, profitable and robust operations.

As we conclude, we present our key recommendations for Norwegian asset managers to drive progress and uphold gender equality in the face of current challenges:

1. Establish long-term targets and measurable indicators to promote social sustainability values, with a specific focus on gender equality and diversity, both within asset management firms and in the companies they invest in.

2. Reinforce dialogue around gender equality and DEI as part of active portfolio management and ownership.

3. Develop specialized DEI investment products, making it easier for customers to invest their savings in the broader sustainability agenda.

4. Collaborate to demand comprehensive DEI data from suppliers and data providers. Work together to ensure access to reliable and consistent information on gender equality and DEI performance.

[18] See references listed in the introduction

Disclaimer

This report is a joint initiative by PwC Norway, CARE Norway, and Finansforbundet, united by a shared commitment to social sustainability and gender equality in finance. The findings are based on interviews with leading Norwegian asset managers and document reviews.

Through this work, we aim to support transparency, raise awareness, and strengthen the role of investors in promoting diversity, equity, and inclusion across markets.

Contact: care@care.no
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