

# Sustainability-related Website Disclosure

Danske Invest Danske Invest Kehittyvät Markkinat Kestävä Tavoite  
LEI code: 743700WSYDCSYRDEDS25

## SUMMARY

You can read a summary of this document here.

## NO SIGNIFICANT HARM TO THE SUSTAINABLE INVESTMENT OBJECTIVE

Considerations of not causing significant harm to an environmental or social objective are managed by applying the exclusions of the fund and through the assessment methodology embedded in the SDG Model.

Assessments made under the SDG Model ensure that an investment in an issuer cannot be classified as a sustainable investment, if the issuer through its operations or manner of production is deemed to have a significant negative impact on sustainability factors, for example in relative terms to a given sector, and the issuer is not taking appropriate measures to mitigate such impacts. The indicators for adverse impacts form part of such analysis. Investments that exceed pre-defined thresholds for indicators in respect to principal adverse impacts will not qualify as sustainable investments for the fund. The thresholds are defined on basis of assessments of when an exposure to either of these indicators is of such impact that it should always be conceived as causing a significant harm to an environmental or social objective. This assessment is evaluated at an ongoing basis.

Below table illustrates the thresholds applied as of this given date:

Adverse sustainability indicator (investee companies)	Metric	ISS ESG Data point	Threshold
Greenhouse gas emissions	Scope 1 GHG emissions	ClimateScope1EmissionsEV	>2 665
Greenhouse gas emissions	Scope 2 GHG emissions	ClimateScope2EmissionsEV	>8 785
Greenhouse gas emissions	Scope 3 GHG emissions	ClimateScope3EmissionsEV	>70 761
Greenhouse gas emissions	Total Scope 1 2 emissions	ClimateScope12EmissionsEV	>11 391
Greenhouse gas emissions	Total Scope 1 2 3 emissions	ClimateScope123EmissionsEV	>82 151
Greenhouse gas emissions	GHG intensity of investee companies	ClimateTotalEmissionsIntEUR	>5 979
Greenhouse gas emissions	GHG intensity of investee companies	ClimateScope123EmissionsIntEUR	>25 687
Greenhouse gas emissions	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources	NonRenewableEnergyProduction	Value equals = 1
Greenhouse gas emissions	Energy consumption intensity	EnergyConsumptionIntensity	>57
Greenhouse gas emissions	Companies active in the fossil fuel sector	FossilFuelInvolvementPAI	Fossil fuel involvement = true AND negative biodiversity impacts = true AND companies without carbon emission reductions = true
Biodiversity	Activities negatively affecting biodiversity-sensitive areas	CompWOCarbonEmissionReduct	Fossil fuel involvement = true AND negative biodiversity impacts = true AND companies without carbon emission reductions = true
Greenhouse gas emissions	Companies without carbon emission reduction initiatives	CompWOCarbonEmissionReduct	Fossil fuel involvement = true AND negative biodiversity impacts = true AND companies without carbon emission reductions = true
Water	Emissions to water	CRCODEmissionsEvic	> 10

<b>Waste</b>	Hazardous waste and radioactive waste ratio	CRHazardousWasteEvic	>3 967
<b>Social and employee matters</b>	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Enhanced Sustainability Standards	UNGC Violation = true AND Lack processes for monitoring UNGC/OECD guidelines =true
<b>Social and employee matters</b>	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	LackProcessesUNGCOECDG uidelines	UNGC Violation = true AND Lack processes for monitoring UNGC/OECD guidelines =true
<b>Social and employee matters</b>	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	InvolvInContrWeapons	Involvement = True
<b>Social and employee matters</b>	Board gender diversity	RatioOfWomenOnBoard	Zero women on board = true AND lacks human right policy = ture AND lacks whistleblower protection =true
<b>Social and employee matters</b>	Lack of a human rights policy	LackHumanRightsPolicy	Zero women on board = true AND lacks human right policy = ture AND lacks whistleblower protection =true
<b>Social and employee matters</b>	Insufficient whistleblower protection	InsWhistleBlowerProtection	Zero women on board = true AND lacks human right policy = ture AND lacks whistleblower protection =true

Alignment with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is specifically sought through the enhanced sustainability standards screening excluding certain conduct and activities deemed harmful to society. The model, among others screen for issuers' adherence to OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Issuers that are assessed to act in breach of conventions in accordance with the criteria of the enhanced sustainability standards screening are not investable by the fund.

## SUSTAINABLE INVESTMENT OBJECTIVE OF THE FINANCIAL PRODUCT

The fund has as its sustainable investment objective to positively contribute to the achievement of the United Nations Sustainable Development Goals (SDGs).

Specifically, the fund's environmental SDG objectives comprise SDG 6 - Clean Water and Sanitation, SDG 7 - Affordable and Clean Energy, SDG 9 - Industry, Innovation and Infrastructure, SDG 11 - Sustainable Cities and Communities, SDG 12 - Responsible Consumption and Production, SDG 13 - Climate Action, SDG 14 - Life Below Water, SDG 15 - Life on Land, and/or SDG 17 - Partnerships for the Goals.

The fund's social SDG objectives comprise SDG 1 - No Poverty, SDG 2 - Zero Hunger, SDG 3 - Good Health and Well-being, SDG 4 - Quality Education, SDG 5 - Gender Equality, SDG 8 - Decent Work and Economic Growth, SDG 10 - Reduced Inequalities, SDG 16 - Peace, Justice and Strong Institutions and/or SDG 17 - Partnership for the Goals.

As an integral part of attaining its sustainable investment objective:

1. The fund promotes sound sustainability practices through inclusion of issuers aligned with the sustainability-profile of the fund.
2. The fund promotes sound environmental stewardship through inclusion of issuers aligned with the carbon-risk-profile of the fund.
3. The fund promotes adherence to UN Global Compact, principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and ILO conventions and other relevant social safeguards through the exclusion of certain activities and conducts deemed harmful to society.
4. The fund promotes environmental safeguards through the exclusion of certain activities deemed to have

- significant negative climate impact.
5. The fund promotes certain ethical and social safeguards through the exclusion of certain activities deemed to be non-ethical or controversial.
  6. The fund considers, addresses and reports on principal adverse impacts.
  7. The fund seeks to influence issuers' impact on sustainability matters through engagement
  8. The fund seeks to influence issues' impact on sustainability matters through having voting on material sustainability topics

The fund does not apply a benchmark for the attainment of its sustainable investment objective.

## **INVESTMENT STRATEGY**

### **Investment strategy**

You can read more about the funds investment strategy in the funds Key Information Document (KID) or in the prospectus. Both are available here:

<https://documents.danskeinvest.com/fund/FI0008809421>

The fund invests in sustainable investments in support of its sustainable investment objective by applying an investment strategy aligned to the UN SDGs, meaning that the SDGs are actively used in the screening and investment analyses leading to the investment decision. The fund in that respect primarily focuses on activities relating to renewable energy, financial inclusion, healthcare and innovation. The fund further favours companies receptive to benefit from shareholder engagement in order to further enhance positive SDG contribution by the respective companies.

The selection of issuers through the SDG Model takes into account products and services manufactured by the issuer and the issuers' alignment of their operations with the SDGs. Issuers that do not have a positive SDG contribution per quantitative criteria, may still be deemed eligible for the portfolio if, on the basis of a qualitative assessment, the insufficient SDG score is deemed incorrect due to lack of data, biases in the model or other relevant considerations as documented, assessed and approved in accordance with the SDG Model criteria.

An investment that positively contributes to at least one of the SDGs per the sustainable investment methodologies and indicators applied for the fund is eligible from the perspective of the sustainable investment objective, provided that do no significant harm criteria are met and minimum safeguards adhered to.

The investment strategy is further focused on limiting the negative externalities (principal adverse impacts) of the fund's investments by the integration of the exclusions and inclusion criteria. Further, the fund engages as part of its investment strategy with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Voting Guidelines.

The sustainable investment objective as supplemented by other promoted environmental and/or social characteristics as well as issuers' good governance practices is integrated in the investment strategy on a continuous basis through a commitment to systematically identify and address sustainability factors embedded in the investment and/or investment selection process. By this, the sustainable investment objective, environmental and/or social characteristics as well as issuers' good governance practices may influence a decision to either buy or increase weighting, hold or maintain weighting, sell or decrease weighting of an investment, in order to attain the fund's characteristics.

Should an investment no longer meet the sustainable investment eligibility criteria for the fund's portfolio due to for instance a changed assessment of sustainability impacts, it will be divested as soon as practicably possible.

The ability to divest may in exceptional cases be impacted by external factors including, but not limited to, geopolitical events, low market liquidity and corporate actions. In these cases, the fund can be forced to hold on to non-sustainable investments. The extent to which the fund's sustainable investment objective and other environmental and/or social characteristics are attained through the investment strategy is monitored on a regular basis and is reported in the fund's annual report.

## Policies to assess good governance

The Responsible Investment Policy and Active Ownership Policy of Danske Invest Fund Management Ltd as supplemented by the fund’s exclusions provide the basis for assessing the issuers, as investee companies, good governance practices. According to this framework, issuers are excluded pursuant to the enhanced sustainability standards screening if issuers are not aligned with UN Global Compact, OECD and ILO principles on good governance (see more information in the “Methodologies” section below). In respect to good governance, the screening applies a supplementing test considering if investee companies meet defined thresholds for prudent management structures, employee matters, remuneration of employees and tax matters. A failure to meet at least half of the thresholds is considered an indicator of a company not meeting good governance practices. Such companies are thus excluded from the fund according to the enhanced screening.

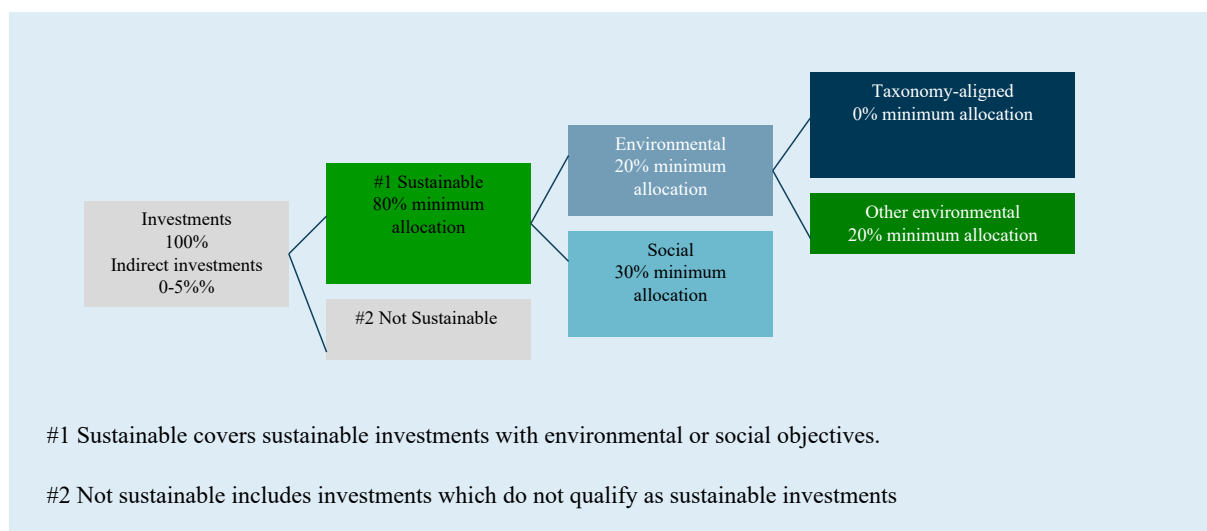
For the management of the fund’s investments, the fund further seeks to be an active owner and to influence issuers directly through dialogue, voting and collaboration with peers, like-minded investors and stakeholders including on matters pertaining to good governance. For voting, the fund’s Voting Guidelines is used as the default position, but investment teams are allowed to deviate based on case-by-case analyses. Voting must always be carried out to the benefit of investors to avoid any conflict of interest.

## PROPORTION OF INVESTMENTS

For investments made for investment purposes the fund invests solely in sustainable investments in support of its sustainable investment objective. As the fund reserves the opportunity of making other investments in cash and derivatives, the expected minimum share of sustainable investments in the fund is 80%. The fund’s sustainable investments consist of:

- environmentally sustainable investments with a minimum commitment to invest 20% or more in these investments
- socially sustainable investments, with a minimum commitment to invest 30% or more in these investments

The minimum allocations are subject to sector specific rules, which under specific circumstances might impose the fund to exceed the 20% bucket of non- sustainable investments to allow for redemptions. The minimum allocations are calculated by use of a weighted calculation against the total market value of the fund’s investments. For how exposures are attained through indirect investments, please refer to the chart below. "Indirect investments" captures exposures in issuers other than direct exposures.



## **MONITORING OF THE SUSTAINABLE INVESTMENT OBJECTIVE**

A number of processes are in place to monitor the attainment of the sustainable investment objective and thereto integrated environmental and/or social characteristics of the fund:

### **System monitoring through compliance engines:**

The fund is screened daily and automatically through compliance engines in Danske Bank A/S to ensure that the sustainable investment thresholds, inclusion commitments and applicable exclusions are adhered to.

The Responsible Investment team in Danske Bank is responsible for maintaining exclusion lists that set out the issuers that the fund is not permitted to hold. As the exclusion lists are integrated into trading and compliance systems, it is automatically detected whether a fund is holding a security that it, in accordance with the prospectus/investment guidelines is not permitted to hold.

### **Monitoring by investment teams:**

The investment team managing the fund has access to a wide selection of ESG data and research through Danske Bank A/S' ESG Data Platform that the teams uses on an ongoing basis to assess new investments and monitor the underlying investments' performance and management of the relevant sustainability indicators of the fund. Further information on the ESG Data Platform may be found under "Data Sources and Processing".

### **Monitoring by Danske Bank's Investment Risk team:**

Through spot-checking and detailed analyses of selected funds and sustainable investment objectives/characteristics, Danske Bank's Investment Risk team can challenge and monitor the extent to which the sustainable investment objective is attained.

More specifically, the team is responsible for a monitoring overlay and mandated to challenge investment teams on not only the financial performance of the funds, but also performance relating to sustainability-dimensions.

## **METHODOLOGIES**

The attainment of the sustainable investments objective of the fund is measured through usage of the following indicators:

1. An internally developed SDG model (the "SDG Model"), which defines sustainable investments for the fund based on the issuer's contribution to the UN SDGs as assessed through quantitative criteria (SDG scores), and/or qualitative assessment criteria and indicators linked to the SDG contribution
2. The weighted ESG score of the portfolio as based on an internally developed model.
3. The weighted carbon risk rating score of the portfolio as based on an external rating.
4. The percentage of investments in the fund with activities and conduct deemed harmful to society as determined through as enhanced internal screening and the number of investments excluded on basis of this screening.
5. The percentage of investments in the fund with activities deemed to have significant negative climate impacts as determined through exclusions for thermal coal (5% revenue), tar sands (5% revenue), peat fired power generation (5% revenue), fossil fuels (5% revenue) and the number of investments excluded as a result of these exclusions.
6. The percentage of investments with non-ethical or controversial activities as determined through exclusions for controversial weapons (0% revenue), tobacco (5% revenue), alcohol (5% revenue), gambling (5% revenue), pornography (1% revenue), and the number of investments excluded as a result of these exclusions.
7. The performance of the fund against the principal adverse impact indicators relevant to the asset classes of the fund as outlined in the Principal Adverse Impact Statement of Danske Invest Fund Management Ltd.
8. The number of engagement activities of the fund.
9. The number of voting activities of the fund.

In terms of the specific methodologies underlying relevant indicators see the below:

## **Sustainable investments in support of the UN SDGs**

The SDG Model of Danske Bank A/S identifies issuers deemed to be sustainable investments on basis of their positive contribution to the UN SDGs. More information on the SDG Model is available on <https://danskebank.com/sustainability-related-disclosures>.

## **ESG Score for the measurement of Sound Sustainability Standards**

Depending on materiality considerations, the ESG score takes into account the following ESG characteristics of issuers: Access & Affordability, Air Quality, Audit & Controls, Board of Directors, Business Ethics, Business Model Resilience, Competitive Behavior, Critical Incident Risk Management, Customer Privacy, Customer Welfare, Data Security, Ecological Impacts, Employee Engagement, Diversity & Inclusion, Employee Health & Safety, Energy Management, GHG Emissions, Human Rights & Community Relations, Labor Practices, Management of the Legal & Regulatory Environment, Materials Sourcing & Efficiency, Physical Impacts of Climate Change, Product Design & Lifecycle Management, Product Quality & Safety, Remuneration, Selling Practices & Product Labeling, Shareholder Rights, Supply Chain Management, Systemic Risk Management, Waste & Hazardous Materials Management, Water & Wastewater Management.

Subject to data limitations, each issuer in the fund's portfolio receives a score from 0-100. A weighted portfolio average of a score on 40 or above is deemed representative of a part of the investment universe which are not laggards in respect to these dimensions.

## **Carbon-Risk Rating Score for the measurement of Sound Environmental Stewardship:**

The Carbon-Risk Rating score is serviced by ISS as an external data vendor.

The Carbon Risk Rating assesses the climate-related performance of issuers, taking into account not only industry-specific challenges and risk profiles, but also considers issuers positive impact. It provides investors with a central instrument for the future-oriented analysis of CO<sub>2</sub>-related risks both at issuer and portfolio level.

Subject to data limitations, each issuer in the fund's portfolio receives a score from 0-100. A weighted portfolio average of a score on 40 or above is deemed representative of a well-performing part of the investment universe in respect to these dimensions.

## **Exclusions:**

All exclusions of the fund are defined by specific criteria and definitions set out in the Exclusion Instruction of Danske Bank A/S which also applies to funds under management of Danske Invest Fund Management Ltd.

For the enhanced sustainability standards screening capturing conduct and activities harmful to society further reference is made to the methodology descriptions in the document "Enhanced Sustainability Standards Screening".

Further information on methodologies and exclusions for activities resulting in significant negative impact on the climate can be found in the document "Reduction of Activities Resulting in Significant Impact Negative on the Climate". This document provides an outline on the methodology on thermal coal exclusions, including criteria for exemption of companies on a transitional pathway in accordance with the TPI framework.

All documents are available under: <https://danskebank.com/sustainability-related-disclosures>.

## **DATA SOURCES AND PROCESSING**

Investment teams have access to proprietary data points and models that have been constructed internally. Our proprietary models uses multiple third-party sources as inputs in order to reduce single-vendor methodology biases. It allow investment teams to get a more nuanced and complete picture of issuers, as one can drill-down and understand why different data sources have opposing views of a given issuer's sustainability performance.

Separately, we source an extensive amount of third-party sustainability data and ratings to have a second opinion on issuers. For many data points/ratings, we source "the same" data point from multiple vendors in order to ensure comparability and evaluate data quality on an ongoing basis. A lot of data is still estimated, hence we find it important to have access to multiple sources. Given the amount of sustainability data points that are factor in, it is not

possible to give one clear answer to the proportion of data is estimated as it varies significantly between data points. Some data, e.g. from CDP, is based fully on company disclosure whereas data points such as e.g. Scope 3 emissions, are based heavily on extensive estimations. Overall, we would argue that most of the data is based on estimations or model assumptions.

In terms of overall data availability, we source data according to a key principle we refer to as “completeness”. With completeness we aim to have a data shelf that: to the largest extent possible, cover sustainability data according to our double-materiality focus (ensuring that we have data covering both financial materiality sustainability topics as well as non-financial risks to the environment/societies) as well as having data of relevance for all investment teams (ensuring that we e.g. do not only source sustainability data on issuers if we have investment strategies investing in governments).

To ensure data quality, subject-matter experts are responsible for evaluating any data set that is onboarded. The standard process for reviewing a data set involves: deep-dives into the data set, drilling down in individual company assessments, benchmarking the data output against other sources/vendors, as well as having calls with the methodology owners behind the given data point(s) being evaluated. If satisfied with the data, data is onboarded and stress-tested on an ongoing basis.

The ESG data points, which the Danske Bank investment teams have available through our ESG Data Platform can be found in the document ‘ESG Data Platform’ available under <https://danskebank.com/sustainability-related-disclosures>.

## **LIMITATIONS TO METHODOLOGIES AND DATA**

There are vast amounts of sustainability data available to the management and monitoring of the fund, but the data landscape is characterized by a lack of consistent methodologies and limited transparency on how scores, indicators ratings are calculated for issuers. These limitations in data are due to a number of factors, not in the least being that they, in part, are a reflection of how sustainability data is produced.

As corporate sustainability disclosures for the time being remain largely voluntary, far from all issuers issue reports covering their management or approach to addressing the sustainability-related aspects of their activities. Moreover, there is a lack of consensus on the scope and format of reporting and as such, issuers that do report do not disclose information in a standardised or easily comparable format. This creates, in certain instance, limitations in relations to the attainment of the sustainable investment objective and/or integrated environmental or social characteristics of the fund. Furthermore, in a bid to support investors in their assessment of issuers, a growing body of ESG data and rating agencies have emerged with their own proprietary scopes and methodologies, which in turn do not allow for comparisons to be made on environmental and/or social issues. In addition, issues emerge across regions and asset classes, small cap and emerging markets in particular, with regards to comprehensive coverage and the availability of quality data.

Various measures are taken to ensure that the attainment of the sustainable investment objective and/or environmental and/or social characteristics are not affected by these known limitations. In recognition of the lack of consensus and standardisation, Danske Bank’s ESG Data Platform consists of credible sources that are assessed to provide relevant information on the material sustainability-related aspects of an investment. Nonetheless, as methodologies vary across the chosen vendors, information is, where relevant and necessary, validated by the investment teams through the review of corporate reports and engagement with the issuers. Finally, to address the risk that arises from metrics being based on model rather than reported data, indicators that are used for the attainment of the sustainable investment objective and/or environmental and/or social characteristics, and are, to the extent possible, validated through our model validation framework.

## **DUE DILIGENCE**

The investment teams review financial and sustainability information from multiple data sources (including but not limited to company reports and third-party investment research). Tools, knowledge, research, education and subject-matter expertise are provided to the investment team to support the due diligence processes. The strength of this bottom-up approach is a solid foundation of data, tools and resources that enables the investment teams to conduct due diligence and attain the sustainable investment objective of the fund. Other ESG data is also integrated into these trading platforms to seamlessly integrate ESG data in portfolio managers' regular work-flows/security views.

Finally, top-down screening is used as a tool to identify issuers on exclusion lists of the fund.

## **ENGAGEMENT POLICIES**

The Active Ownership Policy of Danske Invest Fund Management Ltd with underlying guidelines provide the framework for engagement activities on investments in the fund.

Sustainability-related controversies in investee companies and/or bad performance on principal adverse impact indicators can be managed by individual investment teams or through engagement conducted by the Active Ownership team of Danske Bank A/S. If engagement on these aspects is unsuccessful, the investment team can decide to escalate the engagement, or decide to either hold/maintain weighting, decrease weighting, or sell/divest and/or the Active Ownership team can decide to bring forward a recommendation to have the issuer generally excluded under the enhanced sustainability standard screening. Such decision is subject to approval by the Responsible Investment team of Danske Bank A/S.

For more information see:

[https://www.danskeinvest.fi/page/vastuulliset\\_sijoitukset\\_tietoa](https://www.danskeinvest.fi/page/vastuulliset_sijoitukset_tietoa)

## **ATTAINMENT OF THE SUSTAINABLE INVESTMENT OBJECTIVE**

The fund does not have an index designated for the attainment of its sustainable investment objective but applies an active managed strategy in order to meet the objective.

## **CHANGE LOG**

In September 2023, the versioning of the website disclosures were adjusted for technical reasons. The versioning preset the file versions of the existing disclosures back to v.1 with sequential numbering counting from v.1. For a log on former versions leading to that date please contact Danske Invest Fund Management Ltd.

### **Versions**

29.09.2023 12:59, version 1: Update to SFDR Annex