Sustainability-related Website Disclosure

Danske Invest Europa Indeks KL
LEI code: 549300671J8M8AIWXG20

SUMMARY

You can read a summary of this document here.

NO SUSTAINABLE INVESTMENT OBJECTIVE

The fund promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The fund promotes the following environmental and social characteristics:

1. 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.
2. The fund promotes environmental safeguards through the exclusion of certain activities deemed to have significant negative climate impact.
3. The fund promotes certain ethical and social safeguards through the exclusion of certain activities deemed to be non-ethical or controversial.
4. The fund considers, addresses and reports on principal adverse impacts
5. The fund seeks to influence issuers' impact on sustainability matters through engagement
6. 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 environmental and/or social characteristics.

INVESTMENT STRATEGY

You can read the latest investment strategy in the fund's KID document or prospectus available here: https://documents.danskeinvest.com/fund/DK0060787612

The investment strategy is focused on limiting negative externalities of investments of the fund by the integration of the fund's exclusions. The fund engages as part of its investment strategy with issuers on material sustainability topics if considered necessary.The fund votes on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The promoted environmental and/or social characteristics as well as issuers' good governance practices are 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 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.

The extent to which the fund's 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 Management A/S provide the basis for assessing the issuers, as investee companies, good governance practices. According to this framework the fund must consider good governance as part of the investment decision making process.

Good governance is managed through due diligence and investments analysis processes, including as part of the enhanced sustainability standards screening maintained for funds managed through Danske Invest Management A/S. The enhanced sustainability standards screening excludes issuers deemed not to be aligned with UN Global Compact, OECD and ILO principles on good governance. The screening applies indicators/threshold relating to sound management structures, employee relations, remuneration of staff and tax compliance. Failure to meet the majority of these indicators is seen as an indication of lack of adherence to good governance. Such issuers are excluded per the enhanced screening.

In addition to the controversy screening related to these principles and guidelines, the fund applies a good governance test based on preset indicators for sound management structures, employee relations, remunerations of staff and tax compliance.

For the management of the fund's investments, the fund further seeks to be an active owner and to influence issuers directly through active ownership activities.

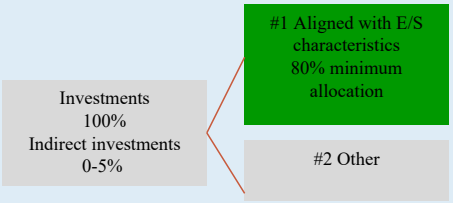
For voting, the fund's Voting Guidelines is used as the default position, but investment teams are allowed to deviate based on case-by-case analyses. Voting must always be carried out to the benefit of investors to avoid any conflict of interest.

PROPORTION OF INVESTMENTS

The fund promotes environmental and/or social characteristics through the application of its exclusions and active ownership activities for investments in its portfolio. As the fund reserves the opportunity of making other investments in cash, derivatives and investments for which there might be insufficient ESG data ("Other"), the expected minimum proportion of investments aligned with the fund's environmental and/or social characteristics is 80%.

For the Other bucket, the fund can thus not guarantee that the investments have been screened for the promotion of the environmental and/or social charactheristics.Further, the fund cannot guarantee that these asset classes are otherwise prioritised in the fund's management and prioritisation of principal adverse impacts.

The minimum proportion of investments aligned with environmental and/or social characteristics are to be seen as the average minimum allocation within the annual reference period as calculated against the total market value of the fund's investments. For how exposures are attained through indirect investments, please refer to the chart below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

A number of processes are in place to monitor the promotion of 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 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.

The daily screening also encompasses other aspects relating to the promoted environmental and social characteristics such as ensuring that the fund adhere to its minimum allocation commitments.

Monitoring by investments teams

The investment team managing the fund has access to a wide selection of ESG data and research through Danske Bank'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 Processes".

Monitoring by Danske Bank's Investment Risk team

Through spot-checking and detailed analyses of selected funds and characteristics, the performance and risk team in Danske Bank A/S can challenge and monitor the extent to which the environmental and/or social characteristics are promoted.

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 environmental or social characteristics promoted by the fund are measured through usage of the following indicators:

1. 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.
2. Investments in the fund with activities deemed to have significant negative climate impacts as determined through exclusions for thermal coal (5% revenue, unless the issuer has a documented and credible transition plan), tar sands (5% revenue), peat fired power generation (5% revenue) and the number of investments excluded as a result of these exclusions.
3. Investments with non-ethical or controversial activities as determined through exclusions for controversial weapons (0% revenue), tobacco (5% revenue), pornography (1% revenue), Statens Pensjonsfund Utland ("SPU") a nd the number of investments excluded as a result of these exclusions.
4. Principal adverse impact indicators relevant to the asset classes of the fund as outlined in the Principal Adverse Impact Statement of Danske Invest Management A/S.
5. The number of engagement activities of the fund.
6. The number of voting activities of the fund.

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

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 applies to funds under management of Danske Invest Management A/S.

For more information see the Exclusion Instruction available at:
https://www.danskeinvest.lu/page/responsible_investments_insight

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" available at: https://danskebank.com/sustainability/publications-and-policies/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 investment team have, available through our ESG Data Platform is published online: 'ESG Data Platform' at:
https://danskebank.com/sustainability/publications-and-policies/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, a reflection of how sustainability data is produced.

As corporate sustainability disclosures 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 environmental or social characteristics of the fund. Furthermore, in a bid to support investors in the 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 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 modelled rather than reported data, indicators that are used for the attainment of environmental and/or social characteristics, and are, to the extent possible, validated through our model validation framework.

DUE DILIGENCE

The investment team reviews 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 promote the environmental and/or social characteristics for the fund.

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 Management A/S 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 Committee of Danske Bank A/S.

For more information on the Active Ownership approach of Danske Invest Management A/S see:

https://www.danskeinvest.lu/page/responsible_investments_insight

DESIGNATED REFERENCE BENCHMARK

The fund does not apply a designated benchmark for the promotion of its environmental and/or social characteristics.

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 Management A/S.

03.10.2023 09:59, version 1: Update to SFDR Annex
03.10.2023 11:15, version 2: Other/multiple changes