# Sustainability-related Website Disclosure

**Danske Invest Kompassi 50**
**LEI code: 743700EZPWI3INUPRW47**

## 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.

While not having a sustainable investment objective, the fund supports the United Nations Sustainable Development Goals (UN SDGs) by investing part of its assets under management in sustainable investments contributing to these goals with a minimum commitment of 5% sustainable investments.

The UN SDGs consist of 17 goals with underlying targets that are tied both to environmental and social objectives. The individual SDGs are: SDG 1: No Poverty; SDG 2: Zero Hunger; SDG 3: Good Health and Well-being; SDG 4: Quality Education; SDG 5: Gender Equality; SDG 6: Clean Water and Sanitation; SDG 7: Affordable and Clean Energy; SDG 8: Decent Work and Economic Growth; SDG 9: Industry, Innovation and Infrastructure; SDG 10: Reduced Inequalities; 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; SDG 16: Peace, Justice and Strong Institutions; and SDG 17: Partnerships for the Goals.

The sustainable investments meet screening criteria of Danske Bank’s methodology for identifying sustainable investments, including criteria defined under a proprietary quantitative model (the "SDG Model") (see "Methodologies").

The fund is not under its investment strategy committed to contribute directly to the environmental objectives of the EU Taxonomy.

"Do no significant harm" is safeguarded through the fund’s general exclusion criteria and through the methodology applied in the identification of sustainable investments.

Based on the indicators on adverse impacts on sustainability factors, the SDG Model determines whether the issuer, through its operations, has an adverse impact on the UN SDGs. Further, issuers with product lines or services that are considered to contribute negatively to environmental or social objectives are not considered to meet the “do no significant harm” requirement, when these activities represent more than 5% of revenue.

"Do no significant harm" is also addressed through thresholds on the PAI-indicators relating to greenhouse gas emissions, sector exposure to fossil fuels, consumption and production of non-renewable energy sources, energy consumption intensity, investments in companies with no carbon emission reduction initiatives, activities adversely impacting biodiversity-sensitive areas, emissions to water, hazardous waste and radioactive waste, as well as social and employee matters of investee companies. Even if an investment has a positive contribution to an environmental or social objective and is generally permitted according to the fund’s exclusion criteria, the investment must comply with the thresholds determined for the fund to be considered a sustainable investment. The thresholds are defined on the basis of assessments of when an exposure to any of these indicators has such an impact that it should be conceived per se as causing significant harm to environmental or social objectives. This assessment is revised continuously to align with improvements in underlying data and developments in the understanding of “do no significant harm”.

The quantitative thresholds can be seen from the table below.

The management of the principal adverse impact indicators for sustainability factors may further vary for certain of the fund's sustainable investments.

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

| | | | |
|---|---|---|---|
| **Social and employee matters** | Lack of a human rights policy | LackHumanRightsPolicy | Zero women on board = true AND lacks human right policy = ture AND lacks whistleblower protection = true |
| **Social and employee matters** | Insufficient whistleblower protection | InsWhistleBlowerProtection | Zero women on board = true AND lacks human right policy = ture AND lacks whistleblower protection = true |

The fund applies exclusions relating to the conduct and/or activities of issuers in different sectors. Exclusions are among others based on an enhanced sustainability standards screening, which screens for issuers that are in breach with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, among other things. Accordingly, the fund does not invest in issuers that are deemed to violate these guidelines and principles as defined through this screening and underlying assessments.

## ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The fund promotes environmental and/or social characteristics through:

A minimum share of sustainable investments: The fund supports the United Nations Sustainable Development Goals (UN SDGs) by investing part of its assets under management in sustainable investments contributing to these goals with a minimum commitment of 5% sustainable investments. See also "Methodologies".

Exclusions: The fund applies exclusions relating to the conduct of issuers and/or activities in specific sectors. See also "Methodologies".

Consideration of investments' principal adverse impacts on sustainability factors: The fund considers the investments' principal adverse impacts on sustainability factors.

Active ownership: The fund is covered by the Active Ownership Policy of Danske Invest Fund Management Ltd and the management of the fund involves an obligation to ensure active ownership in accordance with the conditions and criteria set out therein. See also "Engagement Policies".

For the fund's investments through underlying funds, activities relating to active ownership are handled at the level of the underlying funds, which are generally subject to active ownership policies and guidelines similar to those of the fund.

The fund does not apply a reference benchmark for attaining its environmental 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/FI0008805338

The fund primarily gains exposures to issuers through investments in underlying funds. By the selection of underlying funds, the fund aims to ensure as an integral of its investment strategy that the minimum commitment on sustainable investments can be met, and that other environmental and/or social characteristics are promoted.

For the fund's sustainable investments, the selection involves, as relevant, an assessment of whether any minimum obligations to make sustainable investments apply and whether such sustainable investments support the UN SDGs.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identify and address relevant sustainability factors and ensuring, among other things, that investments are not made in issuers featuring on relevant exclusion lists. By this, the environmental and/or social characteristics may influence a decision to either buy or increase the position, hold or maintain weighting or sell or decrease the weighting of an investment in order to attain the environmental and/or social charactheristics. The same applies to considerations related to good governance

practices.

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

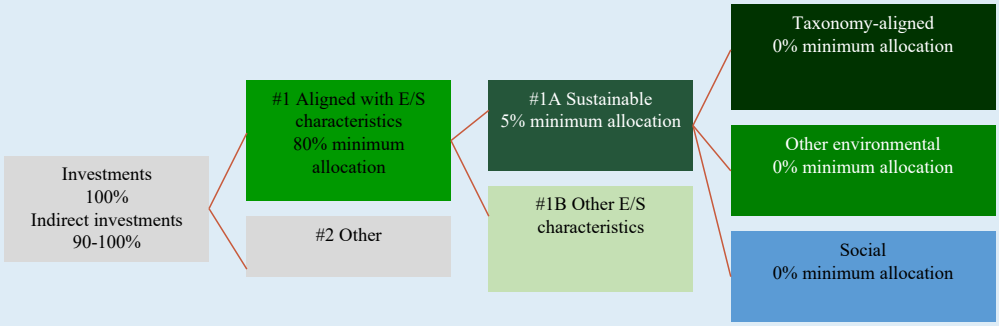
The Responsible Investment Policy of Danske Invest Fund Management Ltd provides the basis for assessing and addressing the issuers' good governance practices. In accordance with the framework, the fund considers good governance practices through the use of exclusions tied to a good governance screening performed by Danske Bank on behalf of Danske Invest Fund Management Ltd.Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance. The screening excludes issuers deemed to fail to comply with international governance principles following from the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined criteria for sound management structures, employee relations, remuneration of staff and tax compliance. Failure to meet these criteria is seen as an indication of an overall lack of adherence to good governance criteria. Such issuers are therefore excluded for the fund.

## PROPORTION OF INVESTMENTS

The fund allocates minimum of 80% of its assets under management to the attainment of its environmental and/or social characteristics. The minimum allocation in this respect covers the share of investments screened for the purposes of the fund's environmental and social characteristics.

The fund has a minimum allocation to sustainable investments of 5%.

The minimum allocation is calculated against the total market value of the the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.




#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.

The category #1 Aligned with E/S characteristics covers:
- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives
- The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify 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 the Investment Organisation

The investment organisation in Danske Bank has access to a wide selection of ESG data and research through Danske Bank's ESG Data Platform that enables sustainability-related assessments and monitoring of investment performance. The ESG Data Platform and supporting investment tools are owned and maintained by the Responsible Investment Team in Danske Bank Asset Management.

### Risk and Performance Monitoring

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 fund applies the following sustainability indicators to attain its environmental and/or social characteristics:

#### Sustainable Investments

The minimum share of sustainable investments is attained through the screening criteria of Danske Bank's methodology for identifying sustainable investments that contribute positively to one of more of the UN SDGs. The attainment of these goals are measured and reported through the weighted share of investments identified as being sustainable on the basis of the criteria defined for the relevant asset class.

The fund's sustainable investments contribute to the UN SDGs by:

- investing in listed securities of issuers that generate more than 50% of their revenues from products and services that contribute positively to one or more SDGs. This is screened and considered through a proprietary model (the "SDG Model") developed and maintained by Danske Bank. An issuer may also meet the criteria for a sustainable investment if its activities predominantly contribute to environmental objectives that are aligned with the EU Taxonomy. However, the fund is not obligated to invest in accordance with the EU Taxonomy.

- investing in sustainability-labelled bonds issued under Regulation (EU) 2023/2631 of 22 November 2023 on European Green Bonds or issued under frameworks developed by the International Capital Markets Association (ICMA) with use of proceeds allocated to projects contributing to one or more of the UN SDGs.

The model or the benchmark of an underlying fund may also be applied as a basis for the fund's sustainable investments, including for investments in passively managed portfolios tracking an EU climate transition benchmark or a Paris-aligned benchmark (collectively an "EU Climate Benchmark"). The investments contribute positively to the reduction of carbon emissions in accordance with the longterm goals of the Paris Agreement and are in relation to the fund's sustainable investment considered to primarily contribute to SDG 13 – Climate Impact. The contribution is measured through the year on year decarbonisation of the underlying fund as measured againt the EU Climate Benchmark as reference benchmark.

The fund does not commit to contribute to all of the UN SDGs, and the fund and the contribution to each of the UN SDGs may vary for the fund's sustainable investments.

More information on the sustainable investment methodologies is available on:

https://danskebank.com/sustainability-related-disclosures

**Exclusions**

The fund's exclusions are attained through the indicators, thresholds and definitions set out in the Exclusion Instruction of Danske Invest Fund Management Ltd. The Exclusion Instruction forms the basis of continuous screening and maintenance of exclusion lists for the fund, the impact of which is reported annually.

The fund excludes:

- issuers that are considered to be in breach with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, conventions adopted by the International Labour Organization (ILO) and other international minimum safeguards and good governance principles under an enhanced sustainability standards screening managed by Danske Bank.

- issuers with activities relating to: tar sands, thermal coal, peat-fired power generation, and tobacco, where each of such activities constitute more than 5% of an issuer's revenue. *On the basis of an assessment of the issuer's transition plan, an issuer may be exempted from an exclusion under the thermal coal exclusion criteria even though the revenue associated to this activity exceeds 5%.*

- Issuers with activities relating to fossil fuels, where the revenue of such activity constitutes more than 5% of an issuer's revenue and where the issuer is not aligned to or aligning to a net-zero pathway per the criteria defined under Danske Bank's Net-Zero Pathway Framework (NZPF) for investee companies

- issuers with activities relating to pornography, where the revenue of such activity constitutes more than 1% of an issuer's revenues.

- issuers involved in controversial weapons.

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 Fund Management Ltd.

The Exclusion Instruction is available on the website 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" available at: https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures

### Principal Adverse Impacts

The principal adverse impacts on sustainability factors are measured against mandatory and voluntary indicators listed in Danske Invest Fund Management Ltd's statement on principal adverse impacts of investment decisions on sustainability factors that are relevant to the asset classes in which the fund is invested ("PAI Indicators").

### Active Ownership

Active ownership is for engagements measured by the number of registered engagements with issuers in the fund. This also applies to engagements with issuers in the portfolio registered by Danske Bank or sub-delegated managers, which have not necessarily taken place in connection with the direct management of the fund.Voting is measured on the number of proposals voted on.

See also "Engagement Policies".

## DATA SOURCES AND PROCESSING

There are vast amounts of sustainability data available to the management and monitoring of the fund, including primary sourced data and model and estimated data sourced from external data vendors, such as ISS ESG, MSCI and Sustainalytics.

For many data points/ratings, "the same" data point is sourced from multiple vendors in order to ensure comparability and evaluate data quality on an ongoing basis.

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 that 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, most of the data is based on estimations or model assumptions.

In terms of overall data availability, data is sourced according to a principle on "completeness". With completeness the aim is to have data availability that to the largest extent possible ensure data coverage to cover both perspectives relating to double-materiality, i.e. data covering both financial materiality sustainability topics as well as non-financial risks to the environment/societies.

To ensure data quality, the Responsible Investment in Danske Bank is responsible for evaluating data sets 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 or
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.

## LIMITATIONS TO METHODOLOGIES AND DATA

The ESG data landscape is characterized by a lack of consistent methodologies and limited transparency on how scores, indicators ratings are calculated for issuers. Sustainability-related data, information, and assessments is not comparable to that of financial information. This implies a risk of misrepresentation of data on sustainability-dimensions or impacts associated to an investment. 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.

No universally accepted framework (legal, regulatory, or others) currently exists in relation to sustainability related data, information, and assessments. Where primary reported data and information is not available, best efforts are made to obtain data, including data estimates, information, and assessments through third-party providers or directly from investee companies, and/or by carrying out additional research or making own reasonable assumptions/estimations.

Despite diligent due diligence in the onboarding of data and other resource and cost proportional considerations in place to ensure the accuracy, completeness, and reliability of the data, it is not possible to verify nor guarantee, directly or indirectly, the complete correctness of the underlying data. Therefore, a certain margin of error is generally to be expected in relation to ESG data.

At this point in time, it is difficult to assess the general magnitude of the margin of error in respect to the data applied in the investment management of the fund, but it is expected to be substantial at least for certain data points.

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 Fund Management Ltd with underlying guidelines provide the framework for active ownership activities on investments in the fund.

Engagements with issuers in the fund may be exercised by individual engagements and collective engagements in accordance with the Engagement Guidelines of Danske Bank.

For individual engagements, the Engagement Guidelines distinguish between:

1) Thematic related engagements
2) Event related engagements
3) Performance-related engagements.

Sustainability-related controversies are generally managed through event-related engagements, which may be initiated when certain incidents, events or sustainability-related controversies are identified through screening processes maintained by the Responsible Investment team at Danske Bank. Specifically, the Responsible Investment team manages the Enhanced Sustainability Standards screening process, a process that normally takes place at a bi-annual basis.

The objective with the Enhanced Sustainability Standards screening is, among others, to identify and screen allegations of companies in breach of international norms and standards defined by international organisations such as UN, ILO and OECD. Depending on the severity of the case and the quality of the allegations brought forward, the Enhanced Sustainability Standards screening may result in recommendations to exclude an issuer. The screening may also conclude that the issuer should be placed on a watchlist, thus opening for further interactions and seek additional information on the case. If the issuer/company does not act as expected concerning these initiatives, a decision may be made to sell holdings, monitor the company more closely, and/or the Responsible Investment team may decide to recommend to have the issuer generally

excluded under the extended sustainability standard screening. Such a decision is subject to approval by Danske Bank's Responsible Investment Committee.

You can find the Engagement Guidelines and the methodology for the Enhanced Sustainability Standards Screening at: https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures
Within the fund, active ownership activities can also be undertaken through voting. Voting activities are managed in accordance with the Voting Guidelines of Danske Bank.

As the fund invests in underlying funds managed through Danske Bank, these activities may be exercised through voting conducted by and on behalf of the underlying funds. Voting activities in the fund are reported annually in the annual report. For any investments in external funds, Danske Bank does not have access to vote. Voting activities in such funds are thus not subject to the Voting Guidelines and are not included in the fund's reported activities.

When voting at general meetings, the goal is to support companies' long-term growth potential, mitigate risks, including sustainability risks, and limit negative impacts on society. The Voting Guidelines provide guidance on how to vote. Voting proposals may in that respect be subject to specific assessments of whether the proposal will protect or increase the investment's value and various other factors. Such considerations can for example include whether there are significant controversies, fines, sanctions, or lawsuits associated with the issuer’s environmental or social practices that are addressed by the proposal and/or whether the issuer is taking the necessary measures to handle these. Voting is managed through the use of an external service provider (ISS) and coordinated through Danske Bank's Responsible Investment team.

## DESIGNATED REFERENCE BENCHMARK

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

**Versions**
03.10.2023 11:24, version 1: Other/multiple changes
27.08.2025 12:36, version 2: Other/multiple changes