

*PROSPECTUS*

---

Investeringsforeningen Danske Invest Select

Published 19 September 2023

**Danske Invest**

# 1 Table of contents

<b>1</b>	<b>Table of contents.....</b>	<b>2</b>
<b>2</b>	<b>Terms of subscription.....</b>	<b>4</b>
<b>3</b>	<b>General matters regarding the fund.....</b>	<b>4</b>
3.1	The fund's name, address, etc.....	4
3.2	The fund's objects .....	4
3.3	The fund's Board of Directors .....	4
3.4	The fund's investment management company .....	5
3.5	The fund's auditors.....	5
3.6	The fund's financial calendar.....	5
<b>4</b>	<b>General information regarding all sub-funds .....</b>	<b>5</b>
<b>5</b>	<b>Sub-fund descriptions.....</b>	<b>10</b>
5.1	AlmenBolig Korte Obligationer KL.....	10
5.2	AlmenBolig Mellemlange Obligationer KL.....	12
5.3	AlmenBolig Obligationer Varighed 2 KL .....	14
5.4	Danske Obligationer Absolut - Lav Risiko KL.....	15
5.5	Danske Obligationer Absolut KL.....	16
5.6	Danske Obligationer Allokering - Akkumulerende KL.....	17
5.7	Danske Obligationer Allokering KL.....	19
5.8	Danske Obligationer Varighed 0-6 KL.....	21
5.9	Danske Obligationer Varighed 3 KL .....	22
5.10	Euro Investment Grade Corporate Bonds Restricted KL.....	23
5.11	Flexinvest Aktier KL.....	25
5.12	Flexinvest Danske Obligationer KL.....	27
5.13	Flexinvest Fonde KL.....	28
5.14	Flexinvest Forvaltning Korte Obligationer KL .....	30
5.15	Flexinvest Globale Obligationer KL.....	31
5.16	Flexinvest Korte Obligationer KL.....	34
5.17	Flexinvest Lange Obligationer KL.....	36
5.18	Global Equity Solution - Akkumulerende KL.....	37
5.19	Global Equity Solution 2 - Akkumulerende KL.....	40
5.20	Global Equity Solution KL.....	42
5.21	Global Sustainable Future 3 KL.....	43
5.22	Global Restricted KL .....	45
5.23	Global Sustainable Future Restricted – Accumulating KL.....	47
5.24	Kommuner 4 KL.....	48
5.25	Norske Aktier Restricted - Akkumulerende KL.....	49
5.26	PP Pension Aktieallokeringsfond - Accumulating KL .....	51
5.27	Tactical Asset Allocation Danmark – Akkumulerende KL.....	53
5.28	Tactical Asset Allocation Norge – Accumulating KL.....	55
5.29	Tactical Asset Allocation Sverige – Accumulating KL.....	57
5.30	Tactical Asset Allocation EURO – Accumulating KL.....	59
5.31	US High Yield Bonds - Akkumulerende KL.....	62
5.32	US High Yield Bonds KL.....	65
5.33	USA Mid Cap – Akkumulerende KL.....	66
5.34	USA Mid Cap KL.....	69
<b>6</b>	<b>Sub-fund/unit class risks .....</b>	<b>71</b>
<b>7</b>	<b>Return, dividends, taxation, etc.....</b>	<b>78</b>
7.1	Retum, dividends and price movements .....	78
7.2	Tax rules.....	79
<b>8</b>	<b>Subscription and subscription costs .....</b>	<b>83</b>
8.1	Tap issue .....	83
8.2	Places of subscription.....	83
8.3	Subscription price.....	83
8.4	Payment for subscription and custody services .....	85

8.5	Issue and redemption prices, etc.....	85
<b>9</b>	<b>Sale, redemption and redemption costs .....</b>	<b>86</b>
9.1	Negotiability and redemption .....	86
9.2	Settlement in connection with redemption .....	88
9.3	Registration, denomination and price specification of units.....	88
9.4	Admission to trading.....	89
<b>10</b>	<b>Operation, business partners and current costs.....</b>	<b>89</b>
10.1	Management.....	89
10.2	Costs for the Board of Directors and the Danish Financial Supervisory Authority.....	90
10.3	Fee to investment management company.....	91
10.4	Custodian .....	91
10.5	Pricing.....	92
10.6	Agent:.....	92
10.7	Portfolio manager.....	93
10.8	Specific information regarding sub-fund PP Pension Aktieallokeringsfond - Accumulating KL.....	94
<b>11</b>	<b>Rights, articles of association and financial reporting matters, etc.....</b>	<b>95</b>
11.1	Registered units .....	95
11.2	Voting rights and other rights .....	96
11.3	Dissolution of the fund, a sub-fund or a unit class .....	96
11.4	Articles of association, annual report, key investor information and holdings statement.....	96
11.5	Temporary financing.....	96
<b>12</b>	<b>Securities financing transactions and collateral security.....</b>	<b>96</b>
12.1	Securities lending .....	97
12.2	Repurchase transactions .....	97
12.3	Criteria used in the selection of counterparties.....	97
12.4	Policy on collateral security.....	98
12.5	Valuation of collateral security.....	99
	<b>APPENDIX 1: Trading costs/composition and maximum size of issue surcharge as a percentage.....</b>	<b>100</b>
	<b>APPENDIX 2: Trading costs/composition and maximum size of redemption discount as a percentage..</b>	<b>102</b>
	<b>APPENDIX 3: Administration fee and management fee .....</b>	<b>104</b>
	<b>APPENDIX 4: Administrative expenses over the last five years .....</b>	<b>106</b>
	<b>APPENDIX 5: Portfolio management fee.....</b>	<b>108</b>
	<b>APPENDIX 6: ISIN, SE No. and FT No. ....</b>	<b>110</b>
	<b>APPENDIX 7: Distribution costs .....</b>	<b>112</b>
	<b>APPENDIX 8: Approved exchanges and markets .....</b>	<b>114</b>
	<b>APPENDIX 9: Sub-fund categories for sustainability-related disclosures .....</b>	<b>115</b>
	<b>APPENDIX 10: SFDR - appendix.....</b>	<b>117</b>

## **2 Terms of subscription**

---

*The Board of Directors of Investeringsforeningen Danske Invest Select has approved that units of the sub-funds are issued on tap without any upper limit on the conditions below.*

*This prospectus applies from 29 August 2023 and supersedes the existing prospectus for the sub-funds.*

*This prospectus has been prepared in accordance with Danish rules and legislation, including Danish Executive Order no. 138 of 17 February 2016 on disclosures in prospectuses for Danish UCITS. The prospectus has been submitted to the Danish Financial Supervisory Authority pursuant to part 12 of the Danish Investment Associations, etc. Act.*

*The prospectus is marketed in Denmark, Norway, Sweden and Finland. The authorities have been notified with a view to marketing the units in Norway, Sweden and Finland.*

*The sub-funds and classes may not be offered for sale or sold in the USA or Canada, and the prospectus may not be distributed to investors resident in those territories.*

*The information in this prospectus may not be relied on as advice on investment-related or other matters. Investors are encouraged to seek individual advice about their own investment and related matters.*

*Any matters mentioned in this prospectus, including investment strategy and risk profile, may be changed by Board resolution within the framework of legislation and the articles of association.*

*Unless otherwise stated, all references to legislation are to Danish legislation.*

## **3 General matters regarding the fund**

---

### **3.1 The fund's name, address, etc.**

Investeringsforeningen Danske Invest Select  
Parallelvej 17, 2800 Kgs. Lyngby, Denmark  
Tel.: +45 33 33 71 71  
CVR no. 18 53 61 02, FT no. 11.052

The fund was established on 10 April 1989.

The sub-funds of the fund are marketed under the secondary name of Investeringsforeningen Danske Invest Engros.

The fund may comprise certificate-issuing as well as account-holding sub-funds.

### **3.2 The fund's objects**

The objects of the fund are to receive, from a wide circle of investors or from the general public, funds which in accordance with a principle of risk diversification will be placed in securities in compliance with the provisions of parts 14 and 15 of the Danish Investment Associations, etc. Act and, at the request of a unitholder, to redeem such unitholder's share of the assets under management with funds derived therefrom. See article 13 of the articles of association.

Based on the above, the fund seeks to invest its funds under management so as to achieve a satisfactory return.

### **3.3 The fund's Board of Directors**

Bo Holse, Chairman

Birgitte Brinch Madsen  
Vice Chairman

Jeanette Fangel Løgstrup

Jan Madsen

Michael Svarer

### **3.4 The fund's investment management company**

Danske Invest Management A/S  
Parallelvej 17, 2800 Kgs. Lyngby, Denmark  
Tel.: +45 33 33 71 71, Fax: 33 15 71 71  
CVR no. 12 52 25 76, FT no. 17.110

The company is owned by Danske Bank A/S.

The management board of the fund's investment management company is comprised of Robert Bruun Mikkelsen, Managing Director, and Morten Rasten, Executive Director.

The fund has entered into an agreement with Danske Invest Management to the effect that the company will be in charge of the day-to-day management of the fund in accordance with the Danish Financial Business Act, the Danish Investment Associations, etc. Act, the fund's articles of association and instructions by the fund's Board of Directors, including investment limits for the individual sub-funds.

The agreement also entails that, following approval by the fund's Board of Directors, the company enters into agreements on portfolio advice/portfolio arrangement, arrangement and other services in respect of the fund's sub-funds.

### **3.5 The fund's auditors**

PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab  
Strandvejen 44, 2900 Hellerup, Denmark  
Company reg. (CVR) no. 33 77 12 31

### **3.6 The fund's financial calendar**

March 2023: Annual report 2022  
April 2023: Annual general meeting  
August 2023: Semi-annual report 2023

## **4 General information regarding all sub-funds**

---

The letters "KL" at the end of a sub-fund's name indicates that the Board of Directors is empowered to make decisions on the forming of unit classes in accordance with the articles of association. If any new unit classes are formed, a new prospectus will be prepared, containing a description of the unit classes.

At a general meeting in the spring of 2016, KL was added to the names of the sub-funds that did not previously include KL in their names.

The current benchmark of each sub-fund/unit class is specified if the relevant sub-fund/unit class applies such benchmark. If replacements have been made to the benchmark, the benchmark *de facto* applied in a given period will be used in the calculations of benchmark return.

*Investment funds with sub-funds using benchmarks comprised by the benchmarks regulation (EU regulation 2016/1011 of 8 June 2016) must disclose whether the benchmarks used are provided by an administrator who is registered by the European Securities and Markets Authority (ESMA).*

*Generally, the fund only uses benchmarks provided by an administrator which is registered by ESMA. Some sub-funds use benchmarks provided by administrators which are not registered by ESMA. A benchmark administrator located outside the EU may apply for authorisation until 31 December 2023.*

*In the description of the sub-funds using benchmarks comprised by the benchmarks regulation, it will be indicated at the name of the benchmark whether the benchmark administrator in question is registered by ESMA.*

The Board of Directors of the fund has laid down procedures for determining benchmark in case of changes to the benchmarks in question or if a given benchmark is no longer provided by an administrator registered by ESMA. Sub-funds/unit classes will not have a benchmark if a suitable index is not available. The objective for sub-funds with no benchmark is to achieve a return equivalent to that for the relevant market with due regard to the sub-fund's risk. If a sub-fund does not follow a benchmark, the reason is stated under the description of the relevant sub-fund.

Sub-funds with an active investment strategy have an objective of achieving a return outperforming the relevant benchmark. For sub-funds with an active investment strategy, we seek to find the best investments in order to maximise the return with due consideration to risk. Due to this strategy, investments will deviate from the benchmark, and returns may outperform or underperform the benchmark.

Sub-funds pursuing a passive investment strategy, so-called index-linked sub-funds, aim to structure their investments to closely track the selected benchmark. This means that investors may expect a return largely in line with benchmark performance. It should be noted, however, that returns typically underperform the benchmark slightly because costs are deducted from returns.

The typical investor in the sub-funds/unit classes wishes to take advantage of the inherent diversification of risk within the investment universe of the sub-funds/unit classes rather than independently making individual investments and building an individual securities portfolio. The typical investor of the sub-funds/unit classes sees this investment as part of a wider portfolio. Other typical conditions for the individual sub-funds are described in the sub-fund descriptions in **section 5**.

### **Responsible investment policy**

Responsible investments are central to the fund's ambition of providing satisfactory returns to its investors. The ambition is to guide issuers (companies) in a more responsible and sustainable direction and contribute to a positive development of society. Accordingly, sustainability factors – which include human rights, labour rights, environment, climate, social matters, bribery and anti-corruption and governance – are natural elements to consider in the investment process of the sub-funds and when portfolio managers engage with issuers (companies).

Danske Invest Management A/S (“Danske Invest”) has defined a responsible investment policy. The policy lays down the overall framework for responsibility in the investment process and the stewardship pursued by the association. The policy lives up to the UN-supported Principles for Responsible Investment and recommendations for stewardship, among other things. The responsible investment policy is available at [www.danskeinvest.dk](http://www.danskeinvest.dk)

### **Description of integration of sustainability risks in the sub-funds**

In accordance with Danske Invest's responsible investment policy, sustainability risks form an integral part of the sub-funds' investment processes alongside other relevant risks.

Integrating sustainability risk into the investment process helps to identify the sustainability factors that may pose a risk and ultimately affect the returns of an investment.

For index-based strategies, investments are selected with a view to reflecting the portfolio composition of the benchmark. The sub-funds' exposure to sustainability risks is thus a reflection of the sustainability risks applicable to the benchmark.

The sub-funds are automatically screened for sustainability factors. This is handled by our portfolio managers on the basis of their own research as well as data and research from other data providers.

As defined in Danske Invest's responsible investment policy and pertaining instructions, the investment universe is screened with reference to current regulations, industry best practices, international norms and voluntary frameworks for corporate responsibility. Based on assessments and engagement with issuers (companies), a decision may be taken from time to time to divest or restrict investments by the sub-funds in general or by a specific sub-fund due to unsuitable exposure to sustainability risks.

Depending on a sub-fund's strategy and risk profile, sustainability risks may thus affect not only investment decisions but also the retention of investments in the portfolio.

In addition to the portfolio managers' own follow-up on sustainability risks, Danske Invest monitors indicators for the sub-funds to ensure prudent management of sustainability risks by the portfolio managers.

See section 6 "Sub-fund/asset class risk factors" for additional information on relevant sustainability risks and their expected impact on individual sub-funds.

### **Description of sustainability-related sub-fund properties**

Pursuant to the rules of SFDR (Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector), Danske Invest must incorporate sustainability-related disclosures in the prospectus for the individual sub-funds. For the individual sub-funds, the disclosure obligation is linked to the sub-fund's SFDR classification and, by extension, whether the sub-fund promotes environmental and/or social characteristics (article 8 classification), has a sustainable investment objective<sup>1</sup> (article 9 classification) or merely incorporate sustainability risks as a part of the investment process (article 6 classification).

For sub-funds under article 8 and article 9, respectively, which we refer to at Danske Invest as "*Sub-funds promoting environmental and/or social characteristics*" and "*Sub-funds with a sustainable investment objective*", respectively, the prospectus (appendix 10) contains additional information related to the relevant sustainability properties for the sub-fund. Information is also available on the website and in the annual report.

Danske Invest has defined a framework for reporting and attainment of the environmental and/or social characteristics and sustainable investment objectives. *Sub-funds promoting environmental and/or social characteristics* (article 8) may have different combinations of characteristics, including that the sub-fund partly invests in sustainable investments. Similarly, a *Sub-fund with a sustainable investment objective* (article 9) may attain different dedicated sustainable investment objectives in combination with the respective other characteristics depending on the individual sub-fund's investment strategy and investment universe. Characteristics and sustainable investment objectives build on uniform binding elements, indicators for monitoring etc. which are embedded in the investment process and shown in the tables below. In this way, the respective environmental and/or social characteristics are promoted and the sustainable investment objectives are attained.

#### ***Sub-funds promoting environmental and/or social characteristics (article 8) or Sub-funds with a sustainable investment objective (article 9)***

In addition to incorporating sustainability risks in all sub-funds, a number of sub-funds are promoting environmental and/or social characteristics (cf. article 8). Article 9 sub-funds also pursue sustainable investment objectives.

Environmental and/or social characteristics and good governance practices may hence influence a decision to either buy or increase weighting, hold or maintain weighting, sell or decrease weighting, in order to promote the characteristics or sustainable investment objective of the sub-fund.

The impact of issuers (companies) on environmental and social characteristics and good governance practices is promoted by voting at general meetings or by engaging with issuers. The engagement is made individually or with other investors. This enables the sub-funds to address topics within good governance practices and sustainability, such as emissions, energy efficiency, biodiversity, water, waste management, employee matters, human rights as well as anti-bribery and anti-corruption.

---

<sup>1</sup> Investment objectives of investing in economic activities that contribute meaningfully to an environmental and/or a social purpose, whose activities do not cause significant harm to other sustainable objectives as specifically defined for sub-funds with sustainable investment objectives and/or selected sub-funds under the designation *Sub-funds promoting environmental and/or social characteristics*.

In addition, screening is used as a tool to identify material adverse impacts on sustainability factors.

This screening could for example lead to the exclusion of issuers (companies) involved in controversial weapons, tar sands, thermal coal, peat-fired power-generation, tobacco and issuers (companies) involved in sustainability controversies and activities considered unacceptable.

More general information about our investment restrictions is available at [www.danskeinvest.dk](http://www.danskeinvest.dk).

The extent to which the environmental and/or social characteristics of the sub-fund are promoted or sustainable investment objective is attained is monitored on a regular basis and is reported in the sub-fund's periodic reporting. Furthermore, active ownership activities and restrictions are disclosed on the website.

The tables below describe how the relevant characteristics and/or sustainable investment objectives are applied for the sub-fund.

### Characteristics promoted for *Sub-funds promoting environmental and/or social characteristics (article 8)*

Sub-fund	Promoted characteristics							
	Sound sustainability practices	Sound environmental stewardship	Reduction of activities and conduct harmful to society	Non-ethical/controversial activity reduction	Climate impact reduction	Investee companies' impact on sustainability matters		Part investment in sustainable investments
						Engagement	Voting	
AlmenBilig Korte Obligationer KL			•	•	•	•		
AlmenBilig Mellemlange Obligationer KL			•	•	•	•		
AlmenBilig Obligationer Varighed 2 KL			•	•	•	•		
Danske Obligationer Absolut - Lav Risiko KL			•	•	•	•		
Danske Obligationer Absolut KL			•	•	•	•		
Danske Obligationer Allokering - Akkumulerende KL			•	•	•	•		
Danske Obligationer Allokering KL			•	•	•	•		
Danske Obligationer Varighed 0 - 6 KL			•	•	•	•		
Danske Obligationer Varighed 3 KL			•	•	•	•		
Euro Investment Grade Corporate Bonds Restricted KL	•	•	•	•	•	•		•
Flexinvest Aktier KL			•	•	•	•	•	•
Flexinvest Danske Obligationer KL			•	•	•	•		
Flexinvest Fonde KL			•	•	•	•		
Flexinvest Forvaltning Korte Obligationer KL			•	•	•	•		
Flexinvest Globale Obligationer KL			•	•	•	•		
Flexinvest Korte Obligationer KL			•	•	•	•		
Flexinvest Lange Obligationer KL			•	•	•	•		
Global Equity Solution - Akkumulerende KL	•	•	•	•	•	•	•	•
Global Equity Solution 2 - Akkumulerende KL	•	•	•	•	•	•	•	•
Global Equity Solution KL	•	•	•	•	•	•	•	•
Global Restricted KL			•	•	•	•	•	•
Kommuner 4 KL			•	•	•	•		
Norske Aktier Restricted – Akkumulerende KL	•	•	•	•	•	•	•	•
PP Pension Aktieallokeringsfond - Accumulating KL			•	•	•	•	•	
Tactical Asset Allocation Danmark – Akkumulerende KL			•	•	•	•	•	
Tactical Asset Allocation Norge – Accumulating KL			•	•	•	•	•	
Tactical Asset Allocation Sverige – Accumulating KL			•	•	•	•	•	
Tactical Asset Allocation EURO – Accumulating KL			•	•	•	•	•	
US High Yield Bonds - Akkumulerende KL			•	•	•	•		
US High Yield Bonds KL			•	•	•	•		
USA Mid Cap – Akkumulerende KL			•	•	•	•	•	
USA Mid Cap KL			•	•	•	•	•	



## Characteristics promoted and sustainable investment objectives pursued for *Sub-funds with a sustainable investment objective* (article 9)

Sub-fund	Promoted characteristics							Sustainable investment objective		
	Sound sustainability practices	Sound environmental stewardship	Reduction of activities and conduct harmful to society	Non-ethical/controversial activity reduction	Climate impact reduction	Investee companies' impact on sustainability matters		SDG contribution	Reduction of CO2 emissions	Transition to a sustainable society
						Engagement	Voting			
Global Sustainable Future 3 KL	•	•	•	•	•	•	•	•		
Global Sustainable Future Restricted - Accumulating KL	•	•	•	•	•	•	•	•		

More information and an additional description of characteristics and sustainable investment objectives are provided in appendix 10 and section 5 under the individual sub-fund. Additional information about monitoring and data sources and methodologies used are found in the document on sustainability-related disclosures for the sub-fund at [www.danskeinvest.dk](http://www.danskeinvest.dk).

### Sub-fund categories for sustainability-related disclosures under SFDR

Appendix 10 shows the SFDR categories of the sub-funds.

### Restrictions

The table below outlines the investment restrictions currently in place for the sub-funds.

If a restriction category is ticked for a given sub-fund, issuers (companies) in scope of the restriction category are excluded from the investment universe of the sub-fund. If a category is not ticked, issuers (companies) in scope of this restriction category may be included depending on the defined investment universe and the portfolio manager's discretion.

For further information on the investment restriction definitions, activities, criteria and thresholds employed by Danske Bank, go to [www.danskeinvest.dk](http://www.danskeinvest.dk). These may vary over time.

Sub-fund	Reduction of activities and conduct harmful to society	Non-ethical/controversial activity reduction							Climate impact reduction			
	Activities and conduct harmful to society	Alcohol	Controversial weapons	Gambling	Military equipment	Pornography	Tobacco	SPU*	Peat-fired power generation	Fossil fuels	Tar sand	Thermal coal
AlmenBolig Korte Obligationer KL	*		*			*	*		*		*	*
AlmenBolig Mellemlange Obligationer KL	*		*			*	*		*		*	*
AlmenBolig Obligationer Varighed 2 KL	*		*			*	*		*		*	*
Danske Obligationer Absolut - Lav Risiko KL	*		*			*	*		*		*	*
Danske Obligationer Absolut KL	*		*			*	*		*		*	*
Danske Obligationer Allokering - Akkumulerende KL	*		*			*	*		*		*	*
Danske Obligationer Allokering KL	*		*			*	*		*		*	*
Danske Obligationer Varighed 0 - 6 KL	*		*			*	*		*		*	*
Danske Obligationer Varighed 3 KL	*		*			*	*		*		*	*
Euro Investment Grade Corporate Bonds Restricted KL	*	*	*	*	*	*	*	*	*	*	*	*
Flexinvest Aktier KL	*		*			*	*		*		*	*
Flexinvest Danske Obligationer KL	*		*			*	*		*		*	*
Flexinvest Fonde KL	*		*			*	*		*		*	*
Flexinvest Forvaltning Korte Obligationer KL	*		*			*	*		*		*	*
Flexinvest Globale Obligationer KL	*		*			*	*		*		*	*
Flexinvest Korte Obligationer KL	*		*			*	*		*		*	*
Flexinvest Lange Obligationer KL	*		*			*	*		*		*	*
Global Equity Solution - Akkumulerende KL	*		*			*	*	*	*	*	*	*
Global Equity Solution 2 - Akkumulerende KL	*		*			*	*	*	*	*	*	*
Global Equity Solution KL	*		*			*	*	*	*	*	*	*
Global Sustainable Future 3 KL	*	*	*	*	*	*	*	*	*	*	*	*
Global Restricted KL	*	*	*	*	*	*	*	*	*	*	*	*
Global Sustainable Future Restricted – Accumulating KL	*	*	*	*	*	*	*	*	*	*	*	*
Kommuner 4 KL	*		*			*	*		*		*	*
Norske Aktier Restricted – Akkumulerende KL	*	*	*	*	*	*	*	*	*	*	*	*
PP Pension Aktieallokeringsfond - Accumulating KL	*		*			*	*		*		*	*
Tactical Asset Allocation Danmark – Akkumulerende KL	*	*	*	*	*	*	*	*	*	*	*	*
Tactical Asset Allocation Norge – Accumulating KL	*	*	*	*	*	*	*	*	*	*	*	*
Tactical Asset Allocation Sverige – Accumulating KL	*	*	*	*	*	*	*	*	*	*	*	*
Tactical Asset Allocation EURO – Accumulating KL	*	*	*	*	*	*	*	*	*	*	*	*
US High Yield Bonds - Akkumulerende KL	*		*			*	*		*		*	*
US High Yield Bonds KL	*		*			*	*		*		*	*
USA Mid Cap – Akkumulerende KL	*	*	*	*	*	*	*	*	*	*	*	*
USA Mid Cap KL	*	*	*	*	*	*	*	*	*	*	*	*

\* Restriction list defined by Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU" restrictions).

## 5 Sub-fund descriptions

The sub-funds are certificate-issuing. The individual descriptions state whether the sub-funds are accumulating or distributing.

Sub-fund and unit class ISIN codes, SE No. and FT No. are shown in **appendix 7**.

Additional information on the quantitative limits referred to in the sub-fund sections and the methods applied by the investment management company to ensure that these limits are observed may be obtained from Danske Invest Management A/S. Investors may also obtain information about recent developments in principal risks and returns for the categories of individual instruments in the sub-fund.

For additional information on specific factors described below, reference is made to the separate information thereon in the subsequent parts of the prospectus.

### 5.1 AlmenBolig Korte Obligationer KL

Date of establishment of the sub-fund:	15 March 2016	
Investment strategy:	Asset	The sub-fund is distributing

The sub-fund is intended for subsidised housing associations covered by the Danish Executive Order on the operation of social housing etc.

Distribution takes place twice a year.

### 5.1.1 Investment universe as defined in the articles of association

Pursuant to the Danish Executive Order on the operation of social housing etc., the sub-fund invests in DKK-denominated bonds in such proportion that the estimated duration of the portfolio is a maximum of three years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in bonds issued or guaranteed by the Danish government.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

The sub-fund may not use derivative financial instruments.

### 5.1.1 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.1.2 Restrictions and specifications relating to portfolio composition

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions regarding the sub-fund's responsible investments are shown in section 4.

Restrictions and specifications may be introduced and changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund/unit class retains its risk profile.

### 5.1.3 The typical investor

The typical investor is a subsidised housing organisation comprised by the Danish non-profit housing and subsidised private co-operative housing etc. act, which according to Part 12 of the Danish Executive Order on the operation of social housing etc., may invest in investment funds which only invest in Danish mortgage or government bonds, including Treasury bills, or in KommuneKredit bonds listed on a stock exchange in an EU member state.

It should be noted that the sub-funds, cf. article 4 of the articles of association, are reserved for subsidised housing associations comprised by the Executive Order on the operation of social housing etc.

### 5.1.4 Specific information regarding the unit class AlmenBolig Korte obligationer, klasse DKK d

Established: 15 March 2016	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	The unit class has no benchmark, as the unit class follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the unit class' return is measured.	

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.1.5 Specific information regarding the unit class AlmenBolig Korte Obligationer, klasse DKK W d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	The unit class has no benchmark, as the unit class follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the unit class' return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.2 AlmenBolig Mellemlange Obligationer KL

Date of establishment of the sub-fund:	9 June 1999
Investment strategy:	Asset

Following a resolution passed at a general meeting in 2012, the sub-fund was transferred to Investeringsforeningen Danske Invest Select. In that connection, the name of the sub-fund was changed from Mellemlange Obligationer to the current name.

The sub-fund is intended for subsidised housing associations covered by the Danish Executive Order on the operation of social housing etc.

Distribution takes place twice a year.

#### 5.2.1 Investment universe as defined in the articles of association

The sub-fund will invest in DKK-denominated bonds pursuant to the Danish Executive order on the operation of social housing etc.

The sub-fund may invest more than 35 per cent of its assets in bonds issued or guaranteed by the Danish government.

The adjusted duration of the bond portfolio of the sub-fund may not exceed five years.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may not use derivative financial instruments.

The sub-fund is intended for subsidised housing associations covered by the Danish Executive Order on the operation of social housing etc.

#### 5.2.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates

these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.2.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions regarding the sub-fund's responsible investments are shown in section 5.

Restrictions and specifications may be introduced and changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund retains its risk profile.

### 5.2.4 The typical investor

The typical investor is a subsidised housing organisation comprised by the Danish non-profit housing and subsidised private co-operative housing etc. act, which according to Part 12 of the Danish Executive Order on the operation of social housing etc., may invest in investment funds which only invest in Danish mortgage or government bonds, including Treasury bills, or in KommuneKredit bonds listed on a stock exchange in an EU member state.

It should be noted that the sub-funds, cf. article 4 of the articles of association, are reserved for subsidised housing associations comprised by the Executive Order on the operation of social housing etc.

### 5.2.5 Specific information regarding the unit class AlmenBolig Mellemlange Obligationer, klasse DKK d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	The unit class has no benchmark, as the unit class follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the unit class' return is measured.	

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.2.6 Specific information regarding the unit class AlmenBolig Mellemlange Obligationer, klasse DKK W d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	The unit class has no benchmark, as the unit class follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the unit class' return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds

managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### **5.3 AlmenBolig Obligationer Varighed 2 KL**

Date of establishment of the sub-fund:	15 March 2016	
Investment strategy:	Asset	The sub-fund is distributing

Distribution takes place twice a year.

#### **5.3.1 Investment universe as defined in the articles of association**

Pursuant to the Danish Executive Order on the operation of social housing etc., the sub-fund invests in DKK-denominated bonds in such proportion that the estimated duration of the portfolio is a minimum of zero years and a maximum of four years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in bonds issued or guaranteed by the Danish government.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

The sub-fund may not use derivative financial instruments.

The sub-fund is intended for subsidised housing associations covered by the Danish Executive Order on the operation of social housing etc. which have signed a portfolio management agreement with Danske Bank Asset Management, division of Danske Bank A/S.

#### **5.3.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### **5.3.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions regarding the sub-fund's responsible investments are shown in section 4.

Restrictions and specifications may be introduced and changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund retains its risk profile.

#### **5.3.4 The typical investor**

The typical investor is a subsidised housing organisation comprised by the Danish non-profit housing and subsidised private co-operative housing etc. act, which according to Part 12 of the Danish Executive Order on the operation of social housing etc., may invest in investment funds which only invest in Danish mortgage or government bonds, including Treasury bills, or in KommuneKredit bonds listed on a stock exchange in an EU member state.

It should be noted that the sub-funds, cf. article 4 of the articles of association, are reserved for subsidised housing associations comprised by the Executive Order on the operation of social housing etc.

For the sub-fund AlmenBolig Obligationer Varighed 2 KL, typical investors have signed a portfolio management agreement with Danske Bank Asset Management, division af Danske Bank A/S.

### 5.3.5 Specific information regarding the unit class AlmenBolig Obligationer Varighed 2, klasse DKK d W

Established: 15 March 2016	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	Danske Bank Asset Management Constant Maturity 2,0 Years	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.4 Danske Obligationer Absolut - Lav Risiko KL

Date of establishment of the sub-fund:	9 September 2008
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund has no benchmark, as the sub-fund follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the sub-fund's return is measured.

#### 5.4.1 Investment universe as defined in the articles of association

The sub-fund invests in DKK-denominated bonds in such proportion that the estimated duration of the portfolio is a maximum of four years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in instruments as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same and as specified in addendum A to the articles of association.

The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments.

Distribution takes place twice a year.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### **5.4.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

#### **5.4.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has currently defined the following additional restrictions for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at a maximum of 3 years.
- Investment may be made in Danish government bonds, Danish mortgage bonds (including mortgage-covered bonds), covered bonds and bonds issued by KommuneKredit or Danmarks Skibskredit.
- The bonds must be listed on Nasdaq Copenhagen A/S.
- The sub-fund will not use the option offered by the articles of association of investing in other funds, sub-funds or investment undertakings.
- The sub-fund will not use the option offered by the articles of association of using derivative financial instruments.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

#### **5.4.4 The typical investor**

Typical investor category	Typical minimum investment horizon
Available funds	3 years

### **5.5 Danske Obligationer Absolut KL**

Date of establishment of the sub-fund:	9 September 2008
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund has no benchmark, as the sub-fund follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the sub-fund’s return is measured.

#### **5.5.1 Investment universe as defined in the articles of association**

The sub-fund invests in bonds denominated in Danish kroner in such proportion that the estimated duration of the portfolio is a maximum of six years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in instruments as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same and as specified in addendum A to the articles of association.

The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.



The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments.

Distribution takes place twice a year.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### **5.5.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.5.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has currently defined the following additional restrictions for investment:

- Investment may be made in Danish government bonds, Danish mortgage bonds (including mortgage-covered bonds), covered bonds and bonds issued by KommuneKredit or Danmarks Skibskredit.
- The bonds must be listed on Nasdaq Copenhagen A/S.
- The sub-fund will not use the option offered by the articles of association of investing in other funds, sub-funds or investment undertakings.
- The sub-fund will not use the option offered by the articles of association of using derivative financial instruments.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### **5.5.4 The typical investor**

Typical investor category	Typical minimum investment horizon
Available funds	3 years

## **5.6 Danske Obligationer Allokering - Akkumulerende KL**

Date of establishment of the sub-fund:	16 April 2013	
Investment strategy:	Asset	The sub-fund is accumulating
Benchmark:	Danske Bank Asset Management's Danish bond index for investors subject to gross income taxation (duration 3 years).	

### **5.6.1 Investment universe as defined in the articles of association**

The sub-fund invests in bonds denominated in Danish kroner, euro or one of its underlying currencies. The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### **5.6.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.6.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at 6 years.
- Investments in DKK-denominated bonds must constitute at least 80 per cent of the sub-fund's assets.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 25 per cent of the sub-fund's assets.
  - The sub-fund may invest in corporate bonds with a rating of Baa3 (Moody's)/BBB- (Standard & Poor's or Fitch) or higher. If a given bond is rated by all the three large rating agencies, the middle one of the three ratings is used for determining whether the rating criterion is met. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Baa3/BBB-, must be sold within 3 months of the downgrading.
  - Regardless of rating category, the sub-fund may invest up to 5 per cent of its assets under management in subordinated loan capital listed on a stock exchange in the EU/EEA.
- The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer. However, for investment in EUR government bonds issued by Germany, the limit is 10 per cent.
- The sub-fund may conclude repo transactions and use derivative financial instruments on both a hedged and unhedged basis. Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe, the involve increased exposure, increasing the sub-fund's possibility of both gains and losses.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.6.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

#### 5.6.5 Specific information regarding the unit class Danske Obligationer Allokering - Akkumulerende, klasse DKK W h

Established: 16 April 2013	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Denmark	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- The unit class will generally hedge the currency exposure against DKK. However, the unit class may have open currency positions of a maximum of 5 per cent of its assets.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the unit class risk profile is maintained.

#### 5.7 Danske Obligationer Allokering KL

Date of establishment of the sub-fund:	04 December 2012
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	Danske Bank Asset Management's Danish bond index for investors subject to gross income taxation (duration 3 years).

##### 5.7.1 Investment universe as defined in the articles of association

The sub-fund invests in bonds denominated in Danish kroner, euro or one of its underlying currencies. The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.7.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

### 5.7.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at 6 years.
- Investments in DKK-denominated bonds must constitute at least 80 per cent of the sub-fund’s assets.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 25 per cent of the sub-fund’s assets.
  - The sub-fund may invest in corporate bonds with a rating of Baa3 (Moody’s)/BBB- (Standard & Poor’s or Fitch) or higher. If a given bond is rated by all the three large rating agencies, the middle one of the three ratings is used for determining whether the rating criterion is met. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Baa3/BBB-, must be sold within 3 months of the downgrading.
  - Regardless of rating category, the sub-fund may invest up to 5 per cent of its assets under management in subordinated loan capital listed on a stock exchange in the EU/EEA.
  - The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer.
- When investing in EUR government bonds, the sub-fund may invest a maximum of 5 per cent of its assets in the same issuer member state, with the exception of Germany, for which the limit is 10 per cent.
- The sub-fund will hedge at least 97 per cent of its currency exposure.
- The sub-fund may conclude repo transactions and use derivative financial instruments on both a hedged basis in the overall portfolio management.
- Derivative financial instruments may be used on a hedged basis as well as on an unhedged basis (see Executive Order on the use of derivative financial instruments by Danish UCITS).
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund’s investment universe and involve increased exposure, increasing the sub-fund’s possibility of both gains and losses.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

Additional information on the quantitative limits described above and the methods applied by the investment management company to ensure that these limits are observed may be obtained from Danske Invest Management A/S. Investors may also obtain information about recent developments in principal risks and returns for the categories of individual instruments in the sub-fund.

### 5.7.4 The typical investor

Typical investor category	Typical minimum investment horizon
---------------------------	------------------------------------

Available funds	3 years
-----------------	---------

## 5.8 Danske Obligationer Varighed 0-6 KL

Date of establishment of the sub-fund:	3 December 2015
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund has no benchmark, as the sub-fund follows an absolute investment strategy, under which the target is a positive return which is independent of the market return. An indicative index is applied, against which the sub-fund's return is measured.

### 5.8.1 Investment universe as defined in the articles of association

The sub-fund invests in bonds denominated in Danish kroner in such proportion that the estimated duration of the portfolio is a maximum of six years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in instruments as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same and as specified in addendum A to the articles of association and **appendix 9** to this prospectus.

The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

Distribution takes place twice a year.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.8.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.8.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Investment may be made in Danish government bonds, Danish mortgage bonds (including mortgage-covered bonds), covered bonds and bonds issued by KommuneKredit or Danmarks Skibskredit.

- The bonds must be listed on Nasdaq Copenhagen A/S.
- The sub-fund will not use the option offered by the articles of association of investing in other funds, sub-funds or investment undertakings.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

Restrictions and specifications may be effected at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.8.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds	3 years

### 5.9 Danske Obligationer Varighed 3 KL

Date of establishment of the sub-fund:	3 December 2015
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	Danske Bank Asset Management Constant Maturity 3,0 years

#### 5.9.1 Investment universe as defined in the articles of association

The sub-fund invests in bonds denominated in Danish kroner in such proportion that the estimated duration of the portfolio is a minimum of one year and a maximum of five years. The neutral duration of the sub-fund is three years.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in instruments as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same and as specified in addendum A to the articles of association and **appendix 9** to this prospectus.

The sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may not invest in premium bonds, convertible bonds or corporate bonds.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

Distribution takes place twice a year.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### 5.9.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates

these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.9.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Investment may be made in Danish government bonds, Danish mortgage bonds (including mortgage-covered bonds), covered bonds and bonds issued by KommuneKredit or Danmarks Skibskredit.
- The bonds must be listed on Nasdaq Copenhagen A/S.
- The sub-fund will not use the option offered by the articles of association of investing in other funds, sub-funds or investment undertakings.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe.
- The sub-fund will not use the option offered by the articles of association of using derivative financial instruments.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

Restrictions and specifications may be effected at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.9.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds	3 years

## 5.10 Euro Investment Grade Corporate Bonds Restricted KL

Date of establishment of the sub-fund:	8 December 2004
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	Bloomberg Capital Euro Major Corporate Index ex bonds issued by companies, whose primary activities are production or trade in tobacco or arms and limited to the rating interval between A1 (Moody's)/A+ (Standard & Poor's) and Baa3 (Moody's)/BBB- (Standard & Poor's). The index is hedged against DKK.

### 5.10.1 Investment universe as defined in the articles of association

The sub-fund invests in bonds denominated in euro or one of its underlying currencies. Additionally, the sub-fund may invest up to 25 per cent of its assets in bonds denominated in DKK, USD, CAD, JPY, GBP, CHF, SEK, NOK or ISK.

The sub-fund may invest in bonds rated Baa3 (Moody's) or BBB- (Standard & Poor's) or higher according to official rating agencies. Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than Baa3/BBB- must be sold within three months of the date of the downgrade.

The sub-fund may not invest in bonds issued by companies whose principal activity is the production of or trade in tobacco or weapons.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same Act and as specified in addendum A to the articles of association.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges or markets specified in the articles of association as resolved by the Board of Directors subject to prior assessment of such markets complying with a specific standard, see the guidelines issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted bonds and money market instruments etc.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

#### **5.10.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### **5.10.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe, the involve increased exposure, increasing the sub-fund's possibility of both gains and losses.
- The sub-fund will generally hedge the currency exposure against DKK, but there may be open currency positions of up to 5 per cent of the assets.
- The sub-fund's risk measure is the duration of the benchmark plus/minus 1 year.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### **5.10.4 The typical investor**

Typical investor category	Typical minimum investment horizon
Available funds	3 years

#### **5.10.5 Specific information regarding the unit class Euro Investment Grade Corporate Bonds Restricted, klasse DKK d**

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
----------------------------	-------------------------------------	--------------------------------------



Taxation of investors:	Distributing and bond-based sub-fund
Benchmark:	Bloomberg Capital Euro Major Corporate Index ex bonds issued by companies, whose primary activities are production or trade in tobacco or arms and limited to the rating interval between A1 (Moody's)/A+ (Standard & Poor's) and Baa3 (Moody's)/BBB- (Standard & Poor's). The index is hedged against DKK.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.10.6 Specific information regarding the unit class Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and bond-based sub-fund	
Benchmark:	Bloomberg Capital Euro Major Corporate Index ex bonds issued by companies, whose primary activities are production or trade in tobacco or arms and limited to the rating interval between A1 (Moody's)/A+ (Standard & Poor's) and Baa3 (Moody's)/BBB- (Standard & Poor's). The index is hedged against DKK.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.11 Flexinvest Aktier KL

Date of establishment of the sub-fund:	30 June 2006
Investment strategy:	Asset
Taxation of investors:	Distributing and equity-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment product. An indicative index is applied, against which the sub-fund's return is measured.

##### 5.11.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The sub-fund may invest in markets as specified in section 139(1) of the Danish Investment Associations, etc. Act.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges or markets specified in the articles of association as resolved by the Board of Directors subject to prior assessment of such markets complying with a specific standard, see the guidelines issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### **5.11.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.11.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its theoretical tracking error below a maximum of 8 percentage points measured on the basis of the composite indicative index set out below, where the weights are stated in brackets, and which is subject to monthly rebalancing:
  - OMX Copenhagen Cap Net (10 per cent)
  - MSCI AC World Index incl. net dividends (90 per cent)
  - The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark of the individual class of security.
- The use of derivative financial instruments must be on a hedged basis. Futures may be used on approved equity indices only, and the gross exposure must not exceed 15 per cent. However, allocated derivative financial instruments can be retained.

- The sub-fund will not actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.
- The sub-fund may engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.11.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	5 years

### 5.12 Flexinvest Danske Obligationer KL

Date of establishment of the sub-fund:	30 June 2006
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund has no benchmark, as the sub-fund is included in a product package. Return is measured and evaluated overall for the product package.

#### 5.12.1 Investment universe as defined in the articles of association

The sub-fund will invest in interest-bearing bonds traded in a regulated market. If the market is located in an EU/EEA member state, the market must be comprised by article 47 of Directive 2004/39/EC (the Markets in Financial Instruments Directive (MiFID)). If the market is located outside an EU/EEA member state, the market must be a member of the World Federation of Exchanges and be located in a country with full membership of the OECD. The bonds must be denominated in Danish kroner, euro, Norwegian kroner or Swedish kronor.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use financial instruments on a hedged basis in accordance with the Order on the use of derivative financial instruments by Danish UCITS. The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### 5.12.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.12.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at a maximum of 7 years.
- Investments in Danish bonds must constitute at least 80 per cent of the sub-fund's assets.
- The sub-fund may invest 20 per cent of its assets under management in government bonds, mortgage bonds and covered bonds issued in EUR, NOK or SEK.
  - o Mortgage bonds and covered bonds issued in EUR, NOK or SEK must be issued by a credit institution approved by a member of the EU/EEA. The bonds must have a minimum rating of A- (according to Moody's, Fitch or Standard & Poor's). Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than A- must be sold within three months of the date of the downgrade.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 50 per cent of the sub-fund's assets.
  - The sub-fund may invest in corporate bonds with a rating of Baa3 (Moody's)/BBB- (Standard & Poor's) or higher. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Baa3/BBB-, must be sold within 3 months of the downgrading.
  - Regardless of rating category, the sub-fund may invest up to 10 per cent of its assets under management in subordinated loan capital listed on a stock exchange in the EU/EEA.
  - The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer.
  - In general, the currency exposure of the sub-fund's investments will be hedged against DKK, but there may be open currency positions of up to 3 per cent of the assets.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.12.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

### 5.13 Flexinvest Fonde KL

Date of establishment of the sub-fund:	13 January 2009
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment product. An indicative index is applied, against which the sub-fund's return is measured.

Distribution takes place twice a year.

#### 5.13.1 Investment universe as defined in the articles of association

The sub-fund will invest in interest-bearing bonds traded in a regulated market. If the market is located in an EU/EEA member state, the market must be comprised by article 47 of Directive 2004/39/EC (the

Markets in Financial Instruments Directive (MiFID)). If the market is located outside an EU/EEA member state, the market must be a member of the World Federation of Exchanges and be located in a country with full membership of the OECD. The bonds must be denominated in Danish kroner, euro, Norwegian kroner or Swedish kronor.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

Having regard to the risk factors, the sub-fund will seek to optimise the return with a view to making the highest possible distributions to investors.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use financial instruments on a hedged basis in accordance with the Order on the use of derivative financial instruments by Danish UCITS. The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### **5.13.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.13.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at a maximum of 8 years.
- Investments in Danish bonds must constitute at least 80 per cent of the sub-fund's assets.
- The sub-fund may invest 20 per cent of its assets under management in government bonds, mortgage bonds and covered bonds issued in EUR, NOK or SEK.
  - o Mortgage bonds and covered bonds issued in EUR, NOK or SEK must be issued by a credit institution approved by a member of the EU/EEA. The bonds must have a minimum rating of A- (according to Moody's, Fitch or Standard & Poor's). Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than A- must be sold within three months of the date of the downgrade.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 20 per cent of the sub-fund's assets.
  - Corporate bonds that are not government-guaranteed must on purchase have a rating of Aa (Moody's)/Aaa (Standard & Poor's) or higher. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Aa/Aaa, must be sold within 3 months of the downgrading.

- The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer. In general, the currency exposure of the sub-fund's investments will be hedged against DKK, but there may be open currency positions of up to 3 per cent of the assets.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.13.4 The typical investor

Typical investor category	Typical minimum investment horizon	Special terms, if any
Available funds and pension assets	3 years	For investors seeking high distribution

#### 5.14 Flexinvest Forvaltning Korte Obligationer KL

Date of establishment of the sub-fund:	26 March 2015
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment product. An indicative index is applied, against which the sub-fund's return is measured.

##### 5.14.1 Investment universe as defined in the articles of association

The sub-fund will invest in interest-bearing bonds traded in a regulated market. If the market is located in an EU/EEA member state, the market must be comprised by article 47 of Directive 2004/39/EC (the Markets in Financial Instruments Directive (MiFID)). If the market is located outside an EU/EEA member state, the market must be a member of the World Federation of Exchanges and be located in a country with full membership of the OECD. The bonds must be denominated in Danish kroner, euro, Norwegian kroner or Swedish kronor.

Investment must be made in such proportion that the estimated duration of the portfolio is a maximum of three years.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

Having regard to the risk factors, the sub-fund will seek to optimise the return with a view to making the highest possible distributions to investors.

The sub-fund may use financial instruments on a hedged basis in accordance with the Order on the use of derivative financial instruments by Danish UCITS.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds

managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### 5.14.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### 5.14.3 Restrictions and specifications regarding sub-fund portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Investments in Danish bonds must constitute at least 80 per cent of the sub-fund's assets.
- The sub-fund may invest 20 per cent of its assets under management in government bonds, mortgage bonds and covered bonds issued in EUR, NOK or SEK.
  - o Mortgage bonds and covered bonds issued in EUR, NOK or SEK must be issued by a credit institution approved by a member of the EU/EEA. The bonds must have a minimum rating of A- (according to Moody's, Fitch or Standard & Poor's). Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than A- must be sold within three months of the date of the downgrade.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 50 per cent of the sub-fund's assets.
  - The sub-fund may invest in corporate bonds with a rating of Baa3 (Moody's)/BBB- (Standard & Poor's) or higher. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Baa3/BBB-, must be sold within 3 months of the downgrading.
  - Regardless of rating category, the sub-fund may invest up to 10 per cent of its assets under management in subordinated loan capital listed on a stock exchange in the EU/EEA.
  - The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer.
- In general, the currency exposure of the sub-fund's investments will be hedged against DKK, but there may be open currency positions of up to 3 per cent of the assets.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.14.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

#### 5.15 Flexinvest Globale Obligationer KL

Date of establishment of the sub-fund:	30 June 2006
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment

product. An indicative index is applied, against which the sub-fund's return is measured.
---

In 2017, the sub-fund changed its name from Flexinvest Udenlandske Obligationsmarkeder KL to its current name.

### **5.15.1 Investment universe as defined in the articles of association**

Comprises investments in global bonds, including government bonds issued by high-rated countries and government bonds issued by emerging market countries, that is, low-rated countries, and in bonds and similar securities issued by high-rated as well as low-rated credit institutions and enterprises.

The sub-fund may also invest in unlisted US corporate bonds traded on the OTC fixed income market which is regulated by the FINRA (Financial Industry Regulatory Authority) and indirectly by the SEC through approval of brokers.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

Securities traded on the OTC fixed income market are of widely differing quality and only satisfy the general US conditions for issuance of corporate bonds.

To the extent that the sub-fund invests in US corporate bonds traded on the OTC fixed income market, such bonds must satisfy the following conditions at the time of investment:

1. The issue must have a market value of USD 100 million or more or its foreign currency equivalent.
2. A credit rating which is not below CCC- (Standard & Poor's) or Caa3 (Moody's), respectively. However, up to 10 per cent of the sub-fund's assets under management may be invested in unrated bonds.
3. Regular quotation of prices by at least two international investment banks/stockbrokers.

The investments made by the sub-fund may involve a high credit risk because the sub-fund is permitted to invest in bonds where the issuer and/or the issue is designated as "speculative grade" or "high yield", that is, have a rating below BBB- (Standard & Poor's) or Baa3 (Moody's).

The sub-fund generally aims for broad diversification by segments and issuers. The sub-fund may hold up to five per cent high-yield corporate bonds issued by the same enterprise and up to five per cent of the same issue.

The portfolio composition of the sub-fund will vary somewhat over time, depending on expectations with respect to the different parts of the global bond market and the foreign currency situation.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same Act and as specified in addendum A to the articles of association.

The sub-fund may invest in markets as specified in section 139(1) of the Danish Investment Associations, etc. Act.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges or markets specified in the articles of association as resolved by the Board of Directors subject to prior assessment of such markets complying with a specific standard, see the guidelines issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.



The sub-fund may invest up to 10 per cent of its assets in unlisted bonds and money market instruments etc.

The sub-fund may use derivative financial instruments.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### **5.15.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.15.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund aims to keep its overall interest-rate risk, measured as adjusted duration, at a maximum of 7 years.
- The Fund may not invest in premium bonds.
- The sub-fund may not invest in convertible bonds or Contingent Convertibles (CoCo Bonds) that can be converted into share capital.
- Derivative financial instruments may periodically be used on a hedged basis as well as on an unhedged basis in connection with the overall portfolio management.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe, the involve increased exposure, increasing the sub-fund's possibility of both gains and losses.
- In general, the currency exposure of the sub-fund's investments will be hedged against DKK. However, an exception applies to any investments by the sub-fund in local currency emerging market bonds, although there may be open currency positions of up to 5 per cent of the sub-fund's assets.
- The sub-fund may invest up to 50 per cent of its assets in other sub-funds if these are distributing sub-funds according to section 16 C of the Danish Tax Assessment Act, and if they only, cf. section 65(8) of the Danish Withholding Tax Act, invest in claims comprised by the Danish Capital Gains Act and in derivative financial instruments according to the Danish Financial Supervisory Authority's thereon.
- The sub-fund may invest up to 25 per cent in bonds that have not been assigned a credit rating by Moody's, Standard & Poor's or Fitch.
- If an issuer of bonds has not been rated by any of the three largest rating agencies, the rating applied will be calculated on the basis of a quantitative model or a rating from a rating agency authorised by ESMA.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.15.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

#### 5.16 Flexinvest Korte Obligationer KL

Date of establishment of the sub-fund:	30 June 2006
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment product. An indicative index is applied, against which the sub-fund's return is measured.

##### 5.16.1 Investment universe as defined in the articles of association

The sub-fund will invest in bonds, convertible bonds and contingency bonds, including government bonds issued by high-rated countries and government bonds issued by emerging market countries, that is, low-rated countries, and in bonds and similar securities issued by high-rated as well as low-rated credit institutions and enterprises. The bonds may be issued in various currencies, and they may be short-term as well as long-term bonds subject, however, to the estimated duration of the portfolio not exceeding three years.

The sub-fund may also invest in unlisted US corporate bonds traded on the OTC fixed income market which is regulated by the FINRA (Financial Industry Regulatory Authority) and indirectly by the SEC through approval of brokers.

Securities traded on the OTC fixed income market are of widely differing quality and only satisfy the general US conditions for issuance of corporate bonds.

To the extent that the sub-fund invests in US corporate bonds traded on the OTC fixed income market, such bonds must satisfy the following conditions at the time of investment:

1. The issue must have a market value of USD 100 million or more or its foreign currency equivalent.
2. A credit rating which is not below CCC- (Standard & Poor's) or Caa3 (Moody's), respectively. However, up to 10 per cent of the sub-fund's assets under management may be invested in unrated bonds.
3. Regular quotation of prices by at least two international investment banks/stockbrokers.

It should be noted that the investments made by the sub-fund may involve a high credit risk because the sub-fund is permitted to invest in bonds where the issuer and/or the issue is designated as "speculative grade" or "high yield", that is, is rated below BBB- (Standard & Poor's) or Baa3 (Moody's).

The sub-fund generally aims for broad diversification by segments and issuers. The sub-fund may hold up to five per cent high-yield corporate bonds issued by the same enterprise and up to five per cent of the same issue.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets in securities etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same and as specified in addendum A to the articles of association and **appendix 9** to this prospectus.

The assets of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest in markets as specified in section 139(1) of the Danish Investment Associations, etc. Act.

The sub-fund may invest up to 10 per cent of its assets under management in unlisted bonds and money market instruments etc.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### **5.16.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### **5.16.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

<b>Limits</b>	<b>Per cent</b>
Danish and European government and mortgage bonds	0-100
Investment grade bonds	0-30
High-yield bonds	0-30
Emerging market bonds	0-30

- The estimated duration of the portfolio may not exceed 3 years.
- Investments in high-yield corporate bonds and emerging market bonds may not exceed 50 per cent of the sub-fund's assets.
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within

the sub-fund's investment universe, the involve increased exposure, increasing the sub-fund's possibility of both gains and losses.

- If an issuer of bonds has not been rated by any of the three largest rating agencies, the rating applied will be calculated on the basis of a quantitative model or a rating from a rating agency authorised by ESMA.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.16.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

#### 5.17 Flexinvest Lange Obligationer KL

Date of establishment of the sub-fund:	13 January 2009
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	The sub-fund does not have a benchmark, because the sub-fund forms part of Flexinvest Fri, a combined investment product. Return is measured and evaluated for the overall investment product. An indicative index is applied, against which the sub-fund's return is measured.

Distribution takes place twice a year.

##### 5.17.1 Investment universe as defined in the articles of association

The sub-fund will invest in interest-bearing bonds traded in a regulated market. If the market is located in an EU/EEA member state, the market must be comprised by article 47 of Directive 2004/39/EC (the Markets in Financial Instruments Directive (MiFID)). If the market is located outside an EU/EEA member state, the market must be a member of the World Federation of Exchanges and be located in a country with full membership of the OECD. The bonds must be denominated in Danish kroner, euro, Norwegian kroner or Swedish kronor.

Investment must be made in such proportion that the estimated duration of the portfolio is a minimum of five years.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The sub-fund may not invest in premium bonds or convertible bonds and may invest a maximum of 50 per cent of its assets under management in corporate bonds.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use financial instruments on a hedged basis in accordance with the Order on the use of derivative financial instruments by Danish UCITS.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.17.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

### 5.17.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Investments in Danish bonds must constitute at least 80 per cent of the sub-fund’s assets.
- The sub-fund may invest 20 per cent of its assets under management in government bonds, mortgage bonds and covered bonds issued in EUR, NOK or SEK.
  - o Mortgage bonds and covered bonds issued in EUR, NOK or SEK must be issued by a credit institution approved by a member of the EU/EEA. The bonds must have a minimum rating of A- (according to Moody’s, Fitch or Standard & Poor’s). Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than A- must be sold within three months of the date of the downgrade.
- In connection with investments in corporate bonds, the following applies:
  - Corporate bonds may not constitute more than 50 per cent of the sub-fund’s assets.
  - The sub-fund may invest in corporate bonds with a rating of Baa3 (Moody’s)/BBB- (Standard & Poor’s) or higher. If the ratings differ, the lowest rating determines whether the rating criterion has been met. Bonds that the sub-fund has invested in, and which are subsequently downgraded to a rating category lower than Baa3/BBB-, must be sold within 3 months of the downgrading.
  - Regardless of rating category, the sub-fund may invest up to 10 per cent of its assets under management in subordinated loan capital listed on a stock exchange in the EU/EEA.
  - The sub-fund may invest a maximum of 5 per cent of its assets under management in a single issuer.
- In general, the currency exposure of the sub-fund’s investments will be hedged against DKK, but there may be open currency positions of up to 3 per cent of the assets.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

### 5.17.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

## 5.18 Global Equity Solution - Akkumulerende KL

Date of establishment of the sub-fund:	16 April 2013
Investment strategy:	Asset
	The sub-fund is accumulating

### 5.18.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The total investments of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### **5.18.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### **5.18.3 Restrictions and specifications regarding sub-fund portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund will aim to keep its ex ante tracking error below a maximum of 8.0 percentage points.
- The sub-fund will not invest in unlisted securities, but allocated unlisted and delisted securities may be retained.
- The use of derivative financial instruments must be on a hedged basis.
- Futures may be used on approved indices only, and the gross exposure may not exceed 15 per cent.
- Other derivative financial instruments may not be used actively, but allocated derivative financial instruments may be retained.

- The sub-fund may engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.18.4 The typical investor

Share class	Typical investor nationality	Typical minimum investment horizon
Global Equity Solution - Akkumulerende, klasse DKK W	Danish	5 years
Global Equity Solution, klasse NOK W	Norwegian	5 years
Global Equity Solution, klasse SEK W	Swedish	5 years

#### 5.18.5 Specific information regarding the unit class Global Equity Solution – Akkumulerende, klasse DKK W

Established: 16 April 2013	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Denmark	
Benchmark:	MSCI World Index incl. net dividends	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- The unit class is not subject to currency hedging.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.18.6 Specific information regarding unit class Global Equity Solution – klasse NOK W

Established: 16 April 2013	Pricing method: Modified single-pricing method	The unit class is offered in Norway
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway	
Benchmark:	MSCI World Index incl. net dividends in NOK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- The unit class is not subject to currency hedging.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.18.7 Specific information regarding unit class Global Equity Solution – class SEK W

Established: 16 April 2013	Pricing method: Modified single-pricing method	The unit class is offered in Sweden
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden	
Benchmark:	MSCI World Index incl. net dividends in SEK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- The unit class is not subject to currency hedging.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.19 Global Equity Solution 2 - Akkumulerende KL

Date of establishment of the sub-fund:	9 September 2013	
Investment strategy:	Asset	The sub-fund is accumulating

#### 5.19.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The total investments of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets.

The sub-fund may invest in markets as specified in section 139(1) of the Danish Investment Associations, etc. Act.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.



Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.19.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

### 5.19.3 Restrictions and specifications regarding sub-fund portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund will not invest in unlisted securities, but allocated unlisted and delisted securities may be retained.
- The sub-fund will aim to keep its ex ante tracking error within a range of 2-8 percentage points. The tracking error reflects how closely a sub-fund tracks its benchmark.
- The use of derivative financial instruments must be on a hedged basis.
- Only equity futures on approved indices and forward exchange contracts may be used. Gross exposure may not exceed 15 per cent.
- Other derivative financial instruments may not be used actively, but allocated derivative financial instruments may be retained.
- The sub-fund may engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

### 5.19.4 The typical investor

Typical investor category	Typical minimum investment horizon
Finnish	5 years

### 5.19.5 Specific information regarding the unit class Global Equity Solution FIN, osuuslaji EUR W

Established: 9 September 2013	Pricing method: Single-pricing method	The unit class is offered in Finland
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Finland	
Benchmark:	MSCI AC World Index incl. net dividends in EUR	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- The unit class is not subject to currency hedging.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

## 5.20 Global Equity Solution KL

Date of establishment of the sub-fund:	8 October 2009
Investment strategy:	Asset
Taxation of investors:	Distributing and equity-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	MSCI World Index incl. net dividends

The sub-fund changed its name in 2011 from Global Allocation to its current name.

### 5.20.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The sub-fund may invest in markets. See section 139(1) of the Danish Investment Associations, etc. Act. Such markets must:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges;
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.20.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

### 5.20.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The use of derivative financial instruments must be on a hedged basis. Futures may be used on approved equity indices only, and the gross exposure must not exceed 15 per cent. Other derivative financial instruments are not used actively, but allocated derivative financial instruments may be retained.
- The sub-fund will not actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.
- The sub-fund will aim to keep its ex ante tracking error below a maximum of 8.0 percentage points.
- The sub-fund may engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

### 5.20.4 The typical investor

Typical investor category	Typical minimum investment horizon
Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

## 5.21 Global Sustainable Future 3 KL

Date of establishment of the sub-fund:	7 April 1999
Investment strategy:	Asset
Taxation of investors:	Distributing and equity-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	MSCI World Index incl. net dividends

In 2010, the sub-fund changed its name from Globale Aktier to its Global KL.

In 2020, the sub-fund changed its name from Global KL to its current name.

### 5.21.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities in companies expected to contribute to selected UN Sustainable Development Goals and/or to accelerate the transition to a sustainable economy. Equities are selected on the basis of specific return expectations for each stock. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges or markets specified in the articles of association as resolved by the Board of Directors subject to prior assessment of such markets complying with a specific standard, see the guidelines issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

#### **5.21.2 Sustainable investment objective**

The sub-fund is categorised as article 9 of the SFDR and has as its sustainable investment objective to accelerate the transition into a sustainable real economy and positively contribute to the achievement of selected United Nations Sustainable Development Goals (SDGs). Climate Stability, Natural Capital and Social Equity are main SDG themes selected by this sub-fund.

In addition to meeting the sustainable investment objective, the sub-fund also promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's sustainable investment objective and about the sub-fund's other environmental and/or social characteristics is provided in appendix 10.

#### **5.21.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Generally, the portfolio will have 30 to 50 positions.
- The sub-fund will not actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.
- The sub-fund may not actively use derivative financial instruments, but allocated derivative financial instruments may be retained.
- The sub-fund will strive to keep its theoretical tracking error in the 2-8 per cent range. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### **5.21.4 The typical investor**

Typical investor category	Typical minimum investment horizon
Available funds	3 years

### 5.21.5 Specific information regarding the unit class Global Sustainable Future 3, klasse DKK d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and equity-based sub-fund	
Benchmark:	MSCI World Index incl. net dividends	

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.21.6 Specific information regarding the unit class Global Sustainable Future 3, klasse DKK W d

Established: 16 March 2017	Pricing method: Dual pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and equity-based sub-fund	
Benchmark:	MSCI World Index incl. net dividends	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

## 5.22 Global Restricted KL

Date of establishment of the sub-fund:	11 March 2010
Investment strategy:	Asset
Taxation of investors:	Distributing and equity-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	MSCI World Index incl. net dividends

### 5.22.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

The investments of the sub-fund are subject to special value-based investment restrictions as determined and regularly adjusted by the Board of Directors.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The sub-fund may invest in markets as defined in section 139(1) of the Danish Investment Associations, etc. Act. Such markets must be:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

#### **5.22.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### **5.22.3 Restrictions and specifications relating to portfolio composition**

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Derivative financial instruments are not used actively, but allocated derivative financial instruments may be retained.
- The sub-fund will not use the option offered by the articles of association of investing in units in other funds, sub-funds or investment undertakings.
- The sub-fund will strive to keep its theoretical tracking error below 10 percentage points. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- The sub-fund may engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.22.4 The typical investor

Typical investor category	Typical minimum investment horizon	Special terms, if any
Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years	Investors have special requirements for value-based investments

### 5.23 Global Sustainable Future Restricted – Accumulating KL

Date of establishment of the sub-fund:	7 September 2010
Investment strategy:	Asset
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway
Pricing method:	Modified single-pricing method
Benchmark:	MSCI World Index, including net dividends hedged against NOK, measured in EUR

The sub-fund is primarily offered in Norway.

In 2020, the sub-fund changed its name from Global Stockpicking – Accumulating KL to its current name.

#### 5.23.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities in companies expected to contribute to selected UN Sustainable Development Goals and/or to accelerate the transition to a sustainable economy. Equities are selected on the basis of specific return expectations for each stock. The definition of equities also includes equity-equivalent securities, including for example certificates of deposit. See section 2(1) of the Danish Investment Associations, etc. Act.

The investments of the sub-fund are subject to special value-based investment restrictions as determined and regularly adjusted by the Board of Directors.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The assets under management of the sub-fund will primarily be placed in:

1. markets located in an EU or EEA member state; or
2. markets that are members of the World Federation of Exchanges; or
3. markets that are Full Members or Associate Members of the Federation of European Securities Exchanges; or
4. markets that are separately approved by the Danish Financial Supervisory Authority; or
5. exchanges and other regulated markets specified in the articles of association by Board resolution and subject to a prior assessment determining that they comply with a specific standard. See guidelines thereon issued by the Danish Financial Supervisory Authority. The exchanges/markets thus approved are specified in addendum B to the articles of association and **appendix 9** to this prospectus.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.23.2 Sustainable investment objective

The sub-fund is categorised as article 9 of the SFDR and has as its sustainable investment objective to accelerate the transition into a sustainable real economy and positively contribute to the achievement of selected United Nations Sustainable Development Goals (SDGs). Climate Stability, Natural Capital and Social Equity are main SDG themes selected by this sub-fund.

In addition to meeting the sustainable investment objective, the sub-fund also promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's sustainable investment objective and about the sub-fund's other environmental and/or social characteristics is provided in appendix 10.

### 5.23.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The portfolio should consist of a maximum of 30-50 stocks.
- The sub-fund is not permitted to actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.
- The sub-fund may use forward transactions to hedge foreign currency exposure. A maximum of 100 per cent of each currency may be hedged. A minimum of 95 per cent of the value of the sub-fund must be hedged against NOK or denominated in NOK.
- Other derivative financial instruments may not be used actively, but allocated derivative financial instruments may be retained.
- The sub-fund will not use the option offered by the articles of association of investing in units in other funds, sub-funds or investment undertakings.
- The sub-fund will strive to keep its theoretical tracking error in the 2-8 per cent range. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.23.4 The typical investor

Typical investor category	Typical minimum investment horizon	Special terms, if any
Pension assets	5 years	Investors have special requirements for value-based investments

### 5.24 Kommuner 4 KL

Date of establishment of the sub-fund:	20 October 1999
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method



Benchmark:	Danske Bank Asset Management's Danish bond index for investors subject to gross income taxation, duration 3 years.
------------	--

Distribution takes place twice a year.

#### 5.24.1 Investment universe as defined in the articles of association

The sub-fund will invest in DKK-denominated bonds.

However, the sub-fund may only place its assets in bonds issued in a member state of the European Union/the European Economic Area and listed on a stock exchange in one of the member states.

The sub-fund may invest more than 35 per cent of its assets in securities issued or guaranteed by the Danish government, provided always that such investment is spread across at least six different issues of securities, and that securities from any one issue do not exceed 30 per cent of the assets of the sub-fund.

The estimated duration of the portfolio is a maximum of four years.

The sub-fund may not invest in corporate bonds, premium bonds or convertible bonds, but the assets of the sub-fund may, at any time, solely consist of assets classified as liquid in a calculation pursuant to the "overdraft rule" stipulated in the Executive Order issued by the Danish Ministry of the Interior about local authority borrowing and issue of guarantees, etc.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may not use derivative financial instruments.

The minimum investment is DKK 100,000.

#### 5.24.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### 5.24.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund may only invest in mortgage bonds, mortgage-covered bonds, covered bonds, KommuneKredit bonds or government bonds.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.24.4 The typical investor

Typical investor category	Typical minimum investment horizon
Municipal funds	3 years

#### 5.25 Norske Aktier Restricted - Akkumulerende KL

Date of establishment of the sub-fund:	12 March 2015	
Investment strategy:	Asset	The sub-fund is accumulating

### 5.25.1 Investment universe as defined in the articles of association

The sub-fund will invest in equities in companies domiciled in, or exercising their principal activity in, or listed on exchanges/market places in Norway. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit.

The investments of the sub-fund are subject to special value-based investment restrictions as determined and regularly adjusted by the Board of Directors.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

The sub-fund may invest up to 10 per cent of its assets under management in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The minimum investment is NOK 3,000,000.

### 5.25.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.25.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The intention is to avoid investing in companies violating accepted international norms and conventions. If a company in the portfolio violate recognised international norms and conventions, the investment in the company must be sold.
- The use of derivative financial instruments must be on a hedged basis. Futures may be used on approved indices only, and the gross exposure must not exceed 15 per cent.
- Other derivative financial instruments are not used actively, but allocated derivative financial instruments may be retained.
- The sub-fund will not use the option offered by the articles of association of engaging in securities lending.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.25.4 The typical investor

Typical investor category	Typical minimum investment horizon
Norwegian institutional investors	5 years

### 5.25.5 Specific information regarding the unit class Norske Aksjer Institusjon Restricted, klasse NOK I

Established: 12 March 2015	Pricing method: Modified single-pricing method	The unit class is offered in Norway
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway	
Benchmark:	OSE Mutual Fund Index measured in NOK	

The Board of Directors has not currently defined any class-specific restrictions or specifications for investments by the unit class.

### 5.26 PP Pension Aktieallokeringsfond - Accumulating KL

Date of establishment of the sub-fund:	15 January 2013	
Investment strategy:	Passive	The sub-fund is accumulating

#### 5.26.1 Investment universe as defined in the articles of association

The sub-fund invests in equities and its objective in composing the portfolio is to track the movements of a global equity index. The definition of equities also includes securities equivalent to equities, including for example certificates of deposit. The investments of the sub-fund may comprise investments not included in the index. The fund's Board of Directors is authorised to select the index, which may be composed of several indices, and subsequently replace the index.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The sub-fund may invest up to 10 per cent of its assets under management in unlisted equities, bonds and money market instruments etc.

Subject to rules laid down by the Danish Financial Supervisory Authority, the sub-fund may use derivative financial instruments and engage in securities lending.

The sub-fund is intended for investors whose funds are invested in the sub-fund by or through Danske Bank Asset Management (division of Danske Bank A/S) pursuant to an agreement between the investor and Danske Bank Asset Management (division of Danske Bank A/S). Additionally, the sub-fund is intended for investors investing in the sub-fund pursuant to a key account agreement with Danske Bank A/S or its group companies.

#### 5.26.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an obligation to systematically supplement the benchmark with an investment process that incorporates these sustainability parameters through screening, investment restrictions and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

#### 5.26.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- The sub-fund may invest in other funds, sub-funds or investment undertakings, but only in the form of UCITS with relation to emerging markets.
- The sub-fund may invest in ADRs/GDRs, but only concerning companies domiciled in emerging market countries.

- The use of derivative financial instruments must be on a hedged basis. Futures may be used on approved equity indices only, and the gross exposure must not exceed 3 per cent. However, allocated derivative financial instruments can be retained.
- The theoretical tracking error of the sub-fund may not exceed 1.0 per cent. The portfolio weightings cannot differ by more than +/- 2 percentage points from benchmark weightings. The tracking error may be higher as a result of exclusion of companies under the RI policy, statutory provisions on placement, restrictions on actual investment options or extraordinary market conditions. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- The sub-fund may not engage in stock lending in accordance with the terms and conditions of a separate agreement with Danske Bank A/S.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.26.4 The typical investor

Share class	Typical investor category	Typical minimum investment horizon
PP Pension Aktieallokeringsfond - Accumulating Class A	Swedish retail investors	5 years
PP Pension Aktieallokeringsfond - Accumulating Class I	Swedish institutional investors	5 years

#### 5.26.5 Specific information regarding the unit class PP Pension Aktieallokeringsfond - Accumulating Class A

Established: 15 January 2013	Pricing method: Single-pricing method	The unit class is offered in Sweden
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden	
Benchmark:	50 per cent MSCI World ( <i>The benchmark administrator is not registered by ESMA</i> ) 20 per cent SIXPRX Portfolio Fund Index ( <i>The benchmark administrator is not registered by ESMA</i> ) 20 per cent VINX Benchmark Cap SEK NI ( <i>The benchmark administrator is not registered by ESMA</i> ) 10 per cent MSCI Emerging Markets ( <i>The benchmark administrator is not registered by ESMA</i> ) The benchmark is rebalanced every month.	

The unit class is offered to retail investors in Sweden.

The unit class is offered to investors who have signed a portfolio management agreement or key account agreement with Danske Bank A/S or another company in the Danske Bank Group.

The Board of Directors has not defined any class-specific restrictions or specifications for investments by the unit class.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors.

#### 5.26.6 Specific information regarding the unit class PP Pension Aktieallokeringsfond - Accumulating Class I

Established: 15 January 2013	Pricing method: Single-pricing method	The unit class is offered in Sweden
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden	

Benchmark:	50 per cent MSCI World ( <i>The benchmark administrator is not registered by ESMA</i> ) 20 per cent SIXPRX Portfolio Fund Index ( <i>The benchmark administrator is not registered by ESMA</i> ) 20 per cent VINX Benchmark Cap SEK P ( <i>The benchmark administrator is not registered by ESMA</i> ) 10 per cent MSCI Emerging Markets ( <i>The benchmark administrator is not registered by ESMA</i> ) The benchmark is rebalanced every month.
------------	--

The unit class is offered to institutional investors in Sweden.

The unit class is offered to investors who have signed a portfolio management agreement or key account agreement with Danske Bank A/S or another company in the Danske Bank Group.

The Board of Directors has not defined any class-specific restrictions or specifications for investments by the unit class.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors.

### 5.27 Tactical Asset Allocation Danmark – Akkumulerende KL

Date of establishment of the sub-fund:	11 June 2020	
Investment strategy:	Asset	The sub-fund is accumulating

#### 5.27.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities, bonds and the like. The definition of equities also includes equity-equivalent securities, including for example certificates of deposit. See section 2(1) of the Danish Investment Associations, etc. Act.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings. See section 143 of the Danish Act on Investment Associations and Special-Purpose Associations as well as other Collective Investment Schemes, etc.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same Act and as specified in addendum A to these articles of association.

The sub-fund may invest in markets as defined in section 139(1) of the Danish Investment Associations, etc. Act. Such markets must be:

1. be located in member states of the European Union or countries with which the Community has made an agreement in the financial area; or
2. be approved by the Danish Financial Supervisory Authority; or
3. be specified in the articles of association subject to prior assessment of such markets complying with a specific standard, see guidelines issued by the Danish Financial Supervisory Authority. The markets thus approved are specified in addendum B to the articles of association. The addendum is subject to amendment as resolved by the Board of Directors. See the guidelines issued by the Danish Financial Supervisory Authority referred to above.

The sub-fund may invest up to 10 per cent of its assets in unlisted securities and money market instruments, etc. See section 139(4) of the Danish Investment Associations, etc. Act.

The sub-fund, which may use derivative financial instruments and engage in securities lending, is a certificate-issuing and accumulating sub-fund. See article 6(6) hereof.

The sub-fund is covered by section 19 of the Danish Capital Gains Tax Act.

Units are issued through a central securities depository in denominations of DKK 100 each or multiples thereof.

### 5.27.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.27.3 Restrictions and specifications regarding sub-fund portfolio composition:

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- The sub-fund aims to allocate its assets within the following limits:

Asset type	Minimum	Maximum
Equities	0 per cent	100 per cent
Bonds denominated in DKK	0 per cent	100 per cent

- The sub-fund may invest in the following bond types denominated in DKK:
  - Government bonds
  - Mortgage bonds including covered mortgage bonds (SDROs)
  - Covered bonds (SDOs)
  - KommuneKredit bonds
  - Danish Ship Finance
- The following restrictions apply only if the asset type makes up more than 10 per cent of the portfolio.
  - For the bond portion, the sub-fund aims to keep its overall risk measure, calculated as adjusted duration, at a maximum deviation of 1 year relative to the duration of the Danske Bank Constant Maturity 3.0 years index.
  - For the equities portion, the sub-fund aims to keep its theoretical tracking error below a maximum of 8 percentage points relative to MSCI World incl. net dividends
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund.
- The sub-fund may invest up to 10 per cent of its assets under management in unlisted securities and money market instruments. The sub-fund will not actively invest in unlisted equities, but allocated unlisted equities and delisted equities may be retained.
- The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.27.4 The typical investor

Share class	Typical category of investor and capital category, if any	Typical minimum investment horizon
Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W	Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

### 5.27.5 Specific information regarding the unit class Tactical Asset Allocation Denmark – Akkumulerende, klasse DKK W

Established: 11 June 2020	Pricing method: Dual-pricing method	The unit class is offered in Denmark
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Denmark	
Benchmark:	The sub-fund does not have a benchmark. An indicative index is applied, against which the sub-fund's return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has not currently defined any class-specific restrictions or specifications for investments by the unit class.

### 5.28 Tactical Asset Allocation Norge – Accumulating KL

Date of establishment of the sub-fund:	11 June 2020	
Investment strategy:	Asset	The sub-fund is accumulating

#### 5.28.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities, bonds and the like. The definition of equities also includes equity-equivalent securities, including for example certificates of deposit. See section 2(1) of the Danish Investment Associations, etc. Act.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings. See section 143 of the Danish Act on Investment Associations and Special-Purpose Associations as well as other Collective Investment Schemes, etc.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same Act and as specified in addendum A to these articles of association.

The sub-fund may invest in markets as defined in section 139(1) of the Danish Investment Associations, etc. Act. Such markets must be:

1. be located in member states of the European Union or countries with which the Community has made an agreement in the financial area; or
2. be approved by the Danish Financial Supervisory Authority; or
3. be specified in the articles of association subject to prior assessment of such markets complying with a specific standard, see guidelines issued by the Danish Financial Supervisory Authority. The markets thus approved are specified in addendum B to the articles of association. The addendum is subject to amendment as resolved by the Board of Directors. See the guidelines issued by the Danish Financial Supervisory Authority referred to above.

The sub-fund may invest up to 10 per cent of its assets in unlisted securities and money market instruments, etc. See section 139(4) of the Danish Investment Associations, etc. Act.

The sub-fund, which may use derivative financial instruments and engage in securities lending, is a certificate-issuing and accumulating sub-fund. See article 6(6) hereof.

The sub-fund is covered by section 19 of the Danish Capital Gains Tax Act.

Units are issued through a central securities depository in denominations of NOK 100 each or multiples thereof.

### 5.28.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.28.3 Restrictions and specifications regarding sub-fund portfolio composition:

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- The sub-fund aims to allocate its assets within the following limits:

Asset type	Minimum	Maximum
Equities	0 per cent	100 per cent
Bonds denominated in NOK	0 per cent	100 per cent

- The sub-fund may invest in the following bond types denominated in NOK:
  - Government bonds
  - Local government bonds, including municipal bonds
  - Bonds issued by public-sector organisations
  - Bonds guaranteed by one of the above issuers
  - Mortgage bonds/covered bonds
  - Investment grade corporate bonds
    - If a given bond is rated by all the three large rating agencies, Moody's, Standard & Poor's and Fitch, the middle one of the three ratings is used for determining whether the rating criterion is met. If the bond is only rated by one or two of the large rating agencies, the lower rating will be used. If the bond has not been assigned an independent rating by any of the three rating agencies, the assessment will be made on the basis of the issuer's general, long-term rating for liabilities in NOK according to the same principles as described above.
    - Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than Baa3/BBB- must not exceed five per cent of the sub-fund's assets under management.
- The following restrictions apply only if the asset type makes up more than 10 per cent of the portfolio.
  - For the bond portion, the sub-fund aims to keep its overall risk measure, calculated as adjusted duration, at a maximum deviation of 1 year relative to the duration of 50 per cent Nordic Bond Pricing index for the Norwegian Regulated floating rate Market, sector 13 (NBP NORM123FRN) and 50 per cent Nordic Bond Pricing index for the Norwegian Regulated fixed income Market, sector 13, duration 3 (NBP NORM123D3).
  - For the equities portion, the sub-fund aims to keep its theoretical tracking error below a maximum of 8 percentage points relative to MSCI World incl. net dividends
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund.



- The sub-fund may invest up to 10 per cent of its assets under management in unlisted securities and money market instruments. The sub-fund will not actively invest in unlisted equities, but allocated unlisted equities and delisted equities may be retained.
- The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.28.4 The typical investor

Share class	Typical category of investor and capital category, if any	Typical minimum investment horizon
Tactical Asset Allocation Norge, klasse NOK W	Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

#### 5.28.5 Specific information regarding the unit class Tactical Asset Allocation Norge, klasse NOK W

Established: 11 June 2020	Pricing method: Modified single-pricing method	The unit class is offered in Norway
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway	
Benchmark:	The sub-fund does not have a benchmark. An indicative index is applied, against which the sub-fund's return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has not currently defined any class-specific restrictions or specifications for investments by the unit class.

#### 5.29 Tactical Asset Allocation Sverige – Accumulating KL

Date of establishment of the sub-fund:	11 June 2020	
Investment strategy:	Asset	The sub-fund is accumulating

##### 5.29.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities, bonds and the like. The definition of equities also includes equity-equivalent securities, including for example certificates of deposit. See section 2(1) of the Danish Investment Associations, etc. Act.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings. See section 143 of the Danish Act on Investment Associations and Special-Purpose Associations as well as other Collective Investment Schemes, etc.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations,

etc. Act, as provided by section 148 of the same Act and as specified in addendum A to these articles of association.

The sub-fund may invest in markets as defined in section 139(1) of the Danish Investment Associations, etc. Act. Such markets must be:

1. be located in member states of the European Union or countries with which the Community has made an agreement in the financial area; or
2. be approved by the Danish Financial Supervisory Authority; or
3. be specified in the articles of association subject to prior assessment of such markets complying with a specific standard, see guidelines issued by the Danish Financial Supervisory Authority. The markets thus approved are specified in addendum B to the articles of association. The addendum is subject to amendment as resolved by the Board of Directors. See the guidelines issued by the Danish Financial Supervisory Authority referred to above.

The sub-fund may invest up to 10 per cent of its assets in unlisted securities and money market instruments, etc. See section 139(4) of the Danish Investment Associations, etc. Act.

The sub-fund, which may use derivative financial instruments and engage in securities lending, is a certificate-issuing and accumulating sub-fund. See article 6(6) hereof.

The sub-fund is covered by section 19 of the Danish Capital Gains Tax Act.

Units are issued through a central securities depository in denominations of SEK 100 each or multiples thereof.

### **5.29.2 Environmental and/or social characteristics**

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### **5.29.3 Restrictions and specifications regarding sub-fund portfolio composition:**

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- The sub-fund aims to allocate its assets within the following limits:

<b>Asset type</b>	<b>Minimum</b>	<b>Maximum</b>
Equities	0 per cent	100 per cent
Bonds denominated in SEK	0 per cent	100 per cent

- The sub-fund may invest in the following bond types denominated in SEK:

- Government bonds
- Municipal bonds
- Bonds issued by public-sector organisations
- Bonds guaranteed by one of the above issuers
- Bostad bonds
- Covered bonds
- Real yield bonds
- Investment grade corporate bonds
  - If a given bond is rated by all the three large rating agencies, Moody's, Standard & Poor's and Fitch, the middle one of the three ratings is used for determining whether the rating criterion is met. If the bond is only rated by one or two of the large rating agencies, the lower rating will be used. If the bond has not been assigned an independent rating by any of the three rating agencies, the assessment will be made on the basis of the issuer's

- general, long-term rating for liabilities in SEK according to the same principles as described above.
- Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than Baa3/BBB- must not exceed five per cent of the sub-fund's assets under management.
  - The following restrictions apply only if the asset type makes up more than 10 per cent of the portfolio.
    - For the bond portion, the sub-fund aims to keep its overall risk measure, calculated as adjusted duration, at a maximum deviation of 1 year relative to the duration of the OMRX Total Market Index.
    - For the equities portion, the sub-fund aims to keep its theoretical tracking error below a maximum of 8 percentage points relative to MSCI World incl. net dividends
  - Derivative financial instruments may be used on both a hedged and an unhedged basis.
  - Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund.
  - The sub-fund may invest up to 10 per cent of its assets under management in unlisted securities and money market instruments. The sub-fund will not actively invest in unlisted equities, but allocated unlisted equities and delisted equities may be retained.
  - The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.
  - Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.29.4 The typical investor

Share class	Typical category of investor and capital category, if any	Typical minimum investment horizon
Tactical Asset Allocation Sverige, klass SEK W	Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

#### 5.29.5 Specific information regarding the unit class Tactical Asset Allocation Sverige, klass SEK W

Established: 11 June 2020	Pricing method: Modified single-pricing method	The unit class is offered in Sweden
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden	
Benchmark:	The sub-fund does not have a benchmark. An indicative index is applied, against which the sub-fund's return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has not currently defined any class-specific restrictions or specifications for investments by the unit class.

#### 5.30 Tactical Asset Allocation EURO – Accumulating KL

Date of establishment of the sub-fund:	11 June 2020	
Investment strategy:	Asset	The sub-fund is accumulating

### 5.30.1 Investment universe as defined in the articles of association

The sub-fund invests globally in equities, bonds and the like. The definition of equities also includes equity-equivalent securities, including for example certificates of deposit. See section 2(1) of the Danish Investment Associations, etc. Act.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings. See section 143 of the Danish Act on Investment Associations and Special-Purpose Associations as well as other Collective Investment Schemes, etc.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

Within its investment universe, the sub-fund may invest more than 35 per cent of its assets under management in securities, etc. as set out in section 147(1)(iv) of the Danish Investment Associations, etc. Act, as provided by section 148 of the same Act and as specified in addendum A to these articles of association.

The sub-fund may invest in markets as defined in section 139(1) of the Danish Investment Associations, etc. Act. Such markets must be:

1. be located in member states of the European Union or countries with which the Community has made an agreement in the financial area; or
2. be approved by the Danish Financial Supervisory Authority; or
3. be specified in the articles of association subject to prior assessment of such markets complying with a specific standard, see guidelines issued by the Danish Financial Supervisory Authority. The markets thus approved are specified in addendum B to the articles of association. The addendum is subject to amendment as resolved by the Board of Directors. See the guidelines issued by the Danish Financial Supervisory Authority referred to above.

The sub-fund may invest up to 10 per cent of its assets in unlisted securities and money market instruments, etc. See section 139(4) of the Danish Investment Associations, etc. Act.

The sub-fund, which may use derivative financial instruments and engage in securities lending, is a certificate-issuing and accumulating sub-fund. See article 6(6) hereof.

The sub-fund is covered by section 19 of the Danish Capital Gains Tax Act.

Units are issued through a central securities depository in denominations of EUR 10 each or multiples thereof.

### 5.30.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.30.3 Restrictions and specifications regarding sub-fund portfolio composition:

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- The sub-fund aims to allocate its assets within the following limits:

Asset type	Minimum	Maximum
Equities	0 per cent	100 per cent
Bonds denominated in EUR	0 per cent	100 per cent

- The sub-fund may invest in the following bond types denominated in EUR:
  - Government bonds

- Bonds issued by public-sector organisations
- Bonds guaranteed by one of the above issuers
- Covered bonds (SDOs)
- Investment grade corporate bonds
  - If a given bond is rated by all the three large rating agencies, Moody's, Standard & Poor's and Fitch, the middle one of the three ratings is used for determining whether the rating criterion is met. If the bond is only rated by one or two of the large rating agencies, the lower rating will be used. If the bond has not been assigned an independent rating by any of the three rating agencies, the assessment will be made on the basis of the issuer's general, long-term rating for liabilities in EUR according to the same principles as described above. Bonds in which the sub-fund has invested and which are subsequently downgraded to a lower rating than Baa3/BBB- must not exceed five per cent of the sub-fund's assets under management.
- The following restrictions apply only if the asset type makes up more than 10 per cent of the portfolio.
  - For the bond portion, the sub-fund aims to keep its overall risk measure, calculated as adjusted duration, at a maximum deviation of 2 years relative to the duration of 40 per cent Euribor 3M TR and 60 per cent Bloomberg EuroAgg Treasury Total Return Index Value.
  - For the equities portion, the sub-fund aims to keep its theoretical tracking error below a maximum of 8 percentage points relative to MSCI World incl. net dividends
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund.
- The sub-fund may invest up to 10 per cent of its assets under management in unlisted securities and money market instruments. The sub-fund will not actively invest in unlisted equities, but allocated unlisted equities and delisted equities may be retained.
- The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.30.4 The typical investor

Share class	Typical category of investor and capital category, if any	Typical minimum investment horizon
Tactical Asset Allocation EURO, class EUR W	Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

#### 5.30.5 Specific information regarding the unit class Tactical Asset Allocation EURO, class EUR W

Established: 11 June 2020	Pricing method: Modified single-pricing method	The unit class is marketed in Finland and Luxembourg
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Finland and Luxembourg	
Benchmark:	The sub-fund does not have a benchmark. An indicative index is applied, against which the sub-fund's return is measured.	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has not currently defined any class-specific restrictions or specifications for investments by the unit class.

### 5.31 US High Yield Bonds - Akkumulerende KL

Date of establishment of the sub-fund:	4 June 2013	
Investment strategy:	Asset	The sub-fund is accumulating

#### 5.31.1 Investment universe as defined in the articles of association

The sub-fund will invest in bonds issued in USD, including government bonds issued by emerging market countries, that is government bonds issued by low-rated countries, and in corporate bonds. Additionally, the sub-fund may invest up to 25 per cent of its assets in bonds issued in currencies other than USD.

The sub-fund may also invest in unlisted US corporate bonds traded on the OTC fixed income market which is regulated by the FINRA (Financial Industry Regulatory Authority) and indirectly by the SEC through approval of brokers.

Securities traded on the OTC fixed income market are of widely differing quality and only satisfy the general US conditions for issuance of corporate bonds.

To the extent that the sub-fund invests in US corporate bonds traded on the OTC fixed income market, such bonds must satisfy the following conditions at the time of investment:

1. The issue must have a market value of USD 100 million or more or its foreign currency equivalent.
2. A credit rating which is not below CCC- (Standard & Poor's) or Caa3 (Moody's), respectively. However, up to 10 per cent of the sub-fund's assets under management may be invested in unrated bonds.
3. Regular quotation of prices by at least two international investment banks/stockbrokers.

The sub-fund may within its investment universe invest up to 10 per cent of its assets in unlisted bonds and money market instruments etc.

It should be noted that the investments made by the sub-fund may involve a high credit risk because the sub-fund is permitted to invest in bonds where the issuer and/or the issue is designated as "speculative grade" or "high yield", that is, have a rating below BBB- (Standard & Poor's) or Baa3 (Moody's).

The sub-fund generally aims for broad diversification by segments and issuers. The sub-fund may hold up to five per cent high-yield corporate bonds issued by the same enterprise and up to five per cent of the same issue.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.31.2 Restrictions and specifications regarding sub-fund portfolio composition:

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- This sub-fund may invest only in securities denominated in USD, CAD, GBP, CHF, SEK, NOK or EUR (or one of the underlying currency units of these currencies).
- The sub-fund must keep its overall interest-rate risk, measured as adjusted duration, in line with the benchmark plus/minus 2 years.
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund's investment universe and involve increased exposure, increasing the sub-fund's possibility of both gains and losses.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.31.3 The typical investor

Share class	Typical category of investor and capital category, if any	Typical minimum investment horizon
US High Yield Bonds - Akkumulerende, klasse DKK W h	Danish pension investors or investors under the Business Tax Scheme	3 years
US High Yield Bonds, klasse NOK W h	Norwegian	3 years
US High Yield Bonds, klasse SEK W h	Swedish	3 years
US High Yield Bonds, osuuslaji EUR W h	Finnish	3 years

### 5.31.4 Specific information regarding the unit class US High Yield Bonds - Akkumulerende, klasse DKK W h

Established: 4 June 2013	Pricing method: Dual-pricing method	The unit class is offered in Denmark
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Denmark	
Benchmark:	Bloomberg US Corp. high yield 2 per cent Issuer Capped Index hedged against DKK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies. The letter "h" designates that the currency exposure is hedged. See below.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- At least 97 per cent of the sub-fund's total assets must be hedged against DKK.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.31.5 Specific information regarding the unit class US High Yield Bonds, klasse SEK W h

Established: 4 June 2013	Pricing method: Modified single-pricing method	The unit class is offered in Sweden
--------------------------	--	-------------------------------------

Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden
Benchmark:	Bloomberg US Corp. high yield 2 per cent Issuer Capped Index hedged against SEK

The unit class was launched on 29 March 2023.

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies. The letter “h” designates that the currency exposure is hedged. See below.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- At least 97 per cent of the sub-fund’s total assets must be hedged against SEK.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### **5.31.6 Specific information regarding the unit class US High Yield Bonds, osuuslaji EUR W h**

Established: 4 June 2013	Pricing method: Modified single-pricing method	The unit class is offered in Finland
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Finland	
Benchmark:	Bloomberg US Corp. high yield 2 per cent Issuer Capped Index hedged against EUR	

The unit class was launched on 29 March 2023.

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies. The letter “h” designates that the currency exposure is hedged. See below.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- At least 97 per cent of the sub-fund’s total assets must be hedged against EUR.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### **5.31.7 Specific information regarding the unit class US High Yield Bonds, klasse NOK W h**

Established: 31 August 2022	Pricing method: Modified single-pricing method	The unit class is offered in Norway
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway	
Benchmark:	Bloomberg US Corp. high yield 2 per cent Issuer Capped Index hedged against NOK	

The unit class is expected to be launched in 2023.

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.



Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The letter “h” designates that the currency exposure is hedged. See below.

The Board of Directors has defined the following current class-specific restrictions and specifications for investments by the unit class:

- At least 97 per cent of the sub-fund’s total assets must be hedged against NOK.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

### 5.32 US High Yield Bonds KL

Date of establishment of the sub-fund:	13 January 2009
Investment strategy:	Asset
Taxation of investors:	Distributing and bond-based sub-fund
Pricing method:	Dual pricing method
Benchmark:	Bloomberg US Corp. high yield 2 per cent Issuer Capped Index hedged against DKK

The sub-fund was established under Placeringsforeningen Profil Invest. Following an annual general meeting resolution in the spring of 2013 and the subsequent approval by the Danish Financial Supervisory Authority, the sub-fund was transferred to Investeringsforeningen Danske Invest Select. In that connection, the sub-fund changed its name from High Yield to its current name, and its investment universe was adjusted.

#### 5.32.1 Investment universe as defined in the articles of association

The sub-fund will invest in bonds issued in USD, including government bonds issued by emerging market countries, that is government bonds issued by low-rated countries, and in corporate bonds. Additionally, the sub-fund may invest up to 25 per cent of its assets in bonds issued in currencies other than USD.

The sub-fund may also invest in unlisted US corporate bonds traded on the OTC fixed income market which is regulated by the FINRA (Financial Industry Regulatory Authority) and indirectly by the SEC through approval of brokers.

Securities traded on the OTC fixed income market are of widely differing quality and only satisfy the general US conditions for issuance of corporate bonds.

To the extent that the sub-fund invests in US corporate bonds traded on the OTC fixed income market, such bonds must satisfy the following conditions at the time of investment:

1. The issue must have a market value of USD 100 million or more or its foreign currency equivalent.
2. A credit rating which is not below CCC- (Standard & Poor’s) or Caa3 (Moody’s), respectively. However, up to 10 per cent of the sub-fund’s assets under management may be invested in unrated bonds.
3. Regular quotation of prices by at least two international investment banks/stockbrokers.

The sub-fund may within its investment universe invest up to 10 per cent of its assets in unlisted bonds and money market instruments etc.

It should be noted that the investments made by the sub-fund may involve a high credit risk because the sub-fund is permitted to invest in bonds where the issuer and/or the issue is designated as “speculative grade” or “high yield”, that is, have a rating below BBB- (Standard & Poor’s) or Baa3 (Moody’s).

The sub-fund generally aims for broad diversification by segments and issuers. The sub-fund may hold up to five per cent high-yield corporate bonds issued by the same enterprise and up to five per cent of the same issue.

The sub-fund may not invest in units in other funds, sub-funds or investment undertakings.

The sub-fund may use derivative financial instruments subject to rules laid down by the Danish Financial Supervisory Authority.

The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.32.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund’s environmental and/or social characteristics is provided in appendix 10.

### 5.32.3 Restrictions and specifications relating to portfolio composition

The sub-fund is currently subject to the following additional restrictions and specifications for investment:

- This sub-fund may invest only in securities denominated in USD, CAD, GBP, CHF, SEK, NOK or EUR (or one of the underlying currency units of these currencies).
- At least 97 per cent of the sub-fund’s total assets must be hedged against DKK.
- The sub-fund must keep its overall interest-rate risk, measured as adjusted duration, in line with the benchmark plus/minus 2 years.
- Derivative financial instruments may be used on both a hedged and an unhedged basis.
- Derivative financial instruments used on an unhedged basis may not constitute in excess of 100 per cent of the assets of the sub-fund. They may be used in respect of all types of instruments within the sub-fund’s investment universe and involve increased exposure, increasing the sub-fund’s possibility of both gains and losses.
- Restrictions regarding the sub-fund’s responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund’s risk profile is maintained.

Additional information on the sub-fund’s quantitative limits and the methods applied by the investment management company to ensure that these limits are observed may be obtained from Danske Invest Management A/S. Investors may also obtain information about recent developments in principal risks and returns for the categories of individual instruments in the sub-fund.

### 5.32.4 The typical investor

Typical investor category	Typical minimum investment horizon
Available funds and pension assets	3 years

## 5.33 USA Mid Cap – Akkumulerende KL

Date of establishment of the sub-fund:	13 June 2019
--	--------------

### 5.33.1 Investment universe as defined in the articles of association

The sub-fund invests primarily in equities in medium-sized companies traded in marketplaces in the USA or in equities in companies domiciled in, or carrying on their principal activity in, the USA, but traded in a marketplace outside the USA. The sub-fund may always invest in companies included in the sub-fund's benchmark.

The sub-fund may not invest in equities in companies domiciled in Denmark.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

The sub-fund may use derivative financial instruments and engage in securities lending. The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.33.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.33.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Mid-cap stocks are defined as companies with a market capitalisation of from USD 3 billion to USD 40 billion. For investments in stocks of new companies, the typical market capitalisation will be from USD 3 billion to USD 15 billion. Usually, the sub-fund will sell stocks in companies achieving a market capitalisation of USD 40 billion.
- The sub-fund will strive to keep its theoretical tracking error below the 2-8 percentage point range. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- The sub-fund may not actively use derivative financial instruments, but allocated derivative financial instruments may be retained.
- The sub-fund will not actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.

- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

#### 5.33.4 The typical investor

Typical investor category	Typical minimum investment horizon
Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

#### 5.33.5 Specific information regarding the unit class USA Mid Cap, klasse DKK W

Established: 13 June 2019	Pricing method: Dual-pricing method	The unit class is offered in Denmark
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Denmark	
Benchmark:	MSCI USA Mid Cap Index incl. net dividends in DKK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.33.6 Specific information regarding the unit class USA Mid Cap, klasse NOK W

Established: 13 June 2019	Pricing method: Modified single-pricing method	The unit class is offered in Norway
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Norway	
Benchmark:	MSCI USA Mid Cap Index incl. net dividends in NOK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### 5.33.7 Specific information regarding the unit class USA Mid Cap, klasse SEK W

Established: 13 June 2019	Pricing method: Modified single-pricing method	The unit class is offered in Sweden
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Sweden	
Benchmark:	MSCI USA Mid Cap Index incl. net dividends in SEK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### **5.33.8 Specific information regarding the unit class USA Mid Cap, osuuslaji EUR W**

Established: 13 June 2019	Pricing method: Modified single-pricing method	The unit class is offered in Finland
Taxation of investors:	Accumulating sub-fund, investors liable to tax in Finland	
Benchmark:	MSCI USA Mid Cap Index incl. net dividends in EUR	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

#### **5.34 USA Mid Cap KL**

Date of establishment of the sub-fund:	13 June 2019
Investment strategy:	Asset

##### **5.34.1 Investment universe as defined in the articles of association**

The sub-fund invests primarily in equities in medium-sized companies traded in marketplaces in the USA or in equities in companies domiciled in, or carrying on their principal activity in, the USA, but traded in a marketplace outside the USA. The sub-fund may always invest in companies included in the sub-fund's benchmark.

The sub-fund may not invest in equities in companies domiciled in Denmark.

Investments may be made directly or through units in other funds, sub-funds or investment undertakings.

The sub-fund may invest up to 20 per cent of its assets under management in money market instruments, short-term bonds, deposits with credit institutions and in other funds, sub-funds or investment undertakings exclusively investing in money market instruments, short-term bonds or deposits with credit institutions.

The total investment of the sub-fund in other funds, sub-funds or investment undertakings may not exceed 10 per cent of its assets under management.

The sub-fund may invest up to 10 per cent of its assets in unlisted equities, bonds and money market instruments etc.

The sub-fund may use derivative financial instruments and engage in securities lending. The sub-fund is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the sub-fund is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

### 5.34.2 Environmental and/or social characteristics

The sub-fund is categorised as article 8 under SFDR and promotes environmental and/or social characteristics, as well as good governance practices, through an investment process that incorporates these sustainability aspects through screening, investment restrictions, investment analysis and active ownership.

Additional information about the sub-fund's environmental and/or social characteristics is provided in appendix 10.

### 5.34.3 Restrictions and specifications relating to portfolio composition

The Board of Directors has defined the following current additional restrictions and specifications for investment:

- Mid-cap stocks are defined as companies with a market capitalisation of from USD 3 billion to USD 40 billion. For investments in stocks of new companies, the typical market capitalisation will be from USD 3 billion to USD 15 billion. Usually, the sub-fund will sell stocks in companies achieving a market capitalisation of USD 40 billion.
- The sub-fund will strive to keep its theoretical tracking error below the 2-8 percentage point range. The theoretical tracking error is calculated in a risk management model and will generally be lower than the actual tracking error which may thus exceed the maximum value stated. The tracking error reflects how closely a sub-fund tracks its benchmark.
- The sub-fund may not actively use derivative financial instruments, but allocated derivative financial instruments may be retained.
- The sub-fund will not actively invest in unlisted securities, but allocated unlisted securities and delisted securities may be retained.
- Restrictions regarding the sub-fund's responsible investments are shown in section 4.

These restrictions and specifications may be changed at the discretion of the Board of Directors and are subject to regular review to ensure that the sub-fund's risk profile is maintained.

### 5.34.4 The typical investor

Typical investor category	Typical minimum investment horizon
Investors with a portfolio management agreement or a key account agreement with Danske Bank A/S	5 years

### 5.34.5 Specific information regarding the unit class USA Mid Cap, klasse DKK W d

Established: 13 June 2019	Pricing method: Dual-pricing method	The unit class is offered in Denmark
Taxation of investors:	Distributing and equity-based sub-fund	
Benchmark:	MSCI USA Mid Cap Index incl. net dividends in DKK	

The unit class is intended for Danske Bank A/S and its group companies and for investors whose funds are invested in the sub-fund by or through asset management entities of Danske Bank A/S or its group companies pursuant to an agreement between the investor and the asset management entity.

Additionally, the unit class is intended for investors investing in the sub-fund under a key account agreement with Danske Bank A/S or its group companies and for investment undertakings/funds managed by investment management companies/fund management companies, etc. of Danske Bank A/S or its group companies.

The Board of Directors has currently not defined any additional restrictions and specifications for investment.

Restrictions and specifications may be introduced or changed at the discretion of the Board of Directors and are subject to regular review to ensure that the risk profile is maintained.

## 6 Sub-fund/unit class risks

As in the case of any investment, an investment in units of the sub-funds/unit classes involves a risk of the investor incurring a loss. Investors should be aware that an investment in units does not correspond to a cash placement, and the value is not guaranteed. The units in a sub-fund/unit class may therefore at any given time be either worth less, the same or more than at the time of investment.

The risks of the sub-fund/unit class are categorised on a scale from 1 to 7. The risk category reflects the typical relationship between risks and potential returns when investing in the sub-fund/unit class and is determined by the classification method applied in the EU. Assignment to risk category 1 indicates minor variations in prices and hence a low risk, typically combined with lower returns. Assignment to risk category 7 indicates major variations in prices and hence a high risk, typically combined with the potential for higher returns. The most recently calculated risk category at any given time can be found in the key investor information document for the sub-fund/unit class, which is available at [www.danskeinvest.com](http://www.danskeinvest.com).

Depending on the investment universe of each sub-fund/unit class, investors should be particularly aware of the following risk factors. See the specification for each sub-fund/unit class.

Sub-fund/Unit class	Country-specific risk	Credit risk	Counterparty risk	Bond market risk	Interest rate risk	Default risk	Risk related to investment style	Risk related to emerging markets	Company-specific risk	Risk related to equity market fluctuations	Exchange rate risk	Sustainability risk
<b>AlmenBolig Korte Obligationer KL</b>												
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	x	x	x	X	x							x
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	x	x	x	X	x							x
<b>AlmenBolig Mellemlange Obligationer KL</b>												
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	x	x	x	X	x							x

<b>Sub-fund/Unit class</b>	<b>Country-specific risk</b>	<b>Credit risk</b>	<b>Counterparty risk</b>	<b>Bond market risk</b>	<b>Interest rate risk</b>	<b>Default risk</b>	<b>Risk related to investment style</b>	<b>Risk related to emerging markets</b>	<b>Company-specific risk</b>	<b>Risk related to equity market fluctuations</b>	<b>Exchange rate risk</b>	<b>Sustainability risk</b>
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	x	x	x	X	x							x
<b>AlmenBolig Obligationer Varighed 2 KL</b>												
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	x	x	x	X	x							x
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	x	x	x	X	x							x
<b>Danske Obligationer Absolut KL</b>	x	x	x	X	x							x
<b>Danske Obligationer Allokering - Akkumulerende KL</b>												
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	x	x	x	X	x				X		x	x
<b>Danske Obligationer Allokering KL</b>	x	x	x	X	x				X		x	X
<b>Danske Obligationer Varighed 0 – 6 KL</b>	x	x	x	X	x							x
<b>Danske Obligationer Varighed 3 KL</b>	x	x	x	X	x							x
<b>Euro Investment Grade Corp Bonds Restricted KL</b>												
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>		x	x	X	x				X		x	x
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>		x	x	X	x				X		x	x
<b>Flexinvest Aktier KL</b>			x				x	X	x	x	x	x
<b>Flexinvest Danske Obligationer KL</b>	x	x	x	X	x				X			x
<b>Flexinvest Fonde KL</b>	x	x	x	X	x				X			x
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	x	x	x	X	x				X			x
<b>Flexinvest Globale Obligationer KL</b>		x	x	X	x		x	X			x	x
<b>Flexinvest Korte Obligationer KL</b>		x	x	X	x		x	X			x	x
<b>Flexinvest Lange Obligationer KL</b>	x	x	x	X	x				X			x
<b>Global Equity Solution - Akkumulerende KL</b>												
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>			x						X	x	x	x
<i>Global Equity Solution, klasse NOK W</i>			x						X	x	x	x
<i>Global Equity Solution, klass SEK W</i>			x						X	x	x	x
<b>Global Equity Solution 2 - Akkumulerende KL</b>												
<i>Global Equity Solution FIN, osuuslaji EUR W</i>			x				x	X	x	x	x	x



<b>Sub-fund/Unit class</b>	<b>Country-specific risk</b>	<b>Credit risk</b>	<b>Counterparty risk</b>	<b>Bond market risk</b>	<b>Interest rate risk</b>	<b>Default risk</b>	<b>Risk related to investment style</b>	<b>Risk related to emerging markets</b>	<b>Company-specific risk</b>	<b>Risk related to equity market fluctuations</b>	<b>Exchange rate risk</b>	<b>Sustainability risk</b>
<b>Global Equity Solution KL</b>			X						X	X	X	X
<b>Global Sustainable Future 3 KL</b>												
<i>Global Sustainable Future 3, klasse DKK d</i>			X						X	X	X	X
<i>Global Sustainable Future 3, klasse DKK W d</i>			X						X	X	X	X
<b>Global Restricted KL</b>			X						X	X	X	X
<b>Global Sustainable Future Restricted – Accumulating KL</b>			X						X	X	X	X
<b>Kommuner 4 KL</b>	X	X	X	X	X							X
<b>Norske Aktier Restricted - Akkumulerende KL</b>												
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	X		X						X	X		X
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>												
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>			X				X	X	X	X	X	X
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>			X				X	X	X	X	X	X
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>												
<i>Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W</i>	X		X	X	X				X	X	X	X
<b>Tactical Asset Allocation Norge – Accumulating KL</b>												
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	X		X	X	X				X	X	X	X
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>												
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	X		X	X	X				X	X	X	X
<b>Tactical Asset Allocation EURO – Accumulating KL</b>												
<i>Tactical Asset Allocation EURO, class EUR W</i>	X		X	X	X				X	X	X	X
<b>US High Yield Bonds - Akkumulerende KL</b>												
<i>US High Yield Bonds - Akkumulerende, klasse DKK W h</i>		X	X	X	X	X			X		X	X
<i>US High Yield Bonds, klass SEK W h</i>		X	X	X	X	X			X		X	X

<b>Sub-fund/Unit class</b>	<b>Country-specific risk</b>	<b>Credit risk</b>	<b>Counterparty risk</b>	<b>Bond market risk</b>	<b>Interest rate risk</b>	<b>Default risk</b>	<b>Risk related to investment style</b>	<b>Risk related to emerging markets</b>	<b>Company-specific risk</b>	<b>Risk related to equity market fluctuations</b>	<b>Exchange rate risk</b>	<b>Sustainability risk</b>
<i>US High Yield Bonds, osuuslaji EUR W h</i>		x	x	X	x	x			x		x	x
<i>US High Yield Bonds, klasse NOK W h</i>		x	x	X	x	x			x		x	x
<b>US High Yield Bonds KL</b>		x	x	X	x	x			x		x	x
<b>USA Mid Cap – Akkumulernde KL</b>												
<i>USA Mid Cap, klasse DKK W</i>	x		x				x		x	x	x	x
<i>USA Mid Cap, klasse NOK W</i>	x		x				x		x	x	x	x
<i>USA Mid Cap, klass SEK W</i>	x		x				x		x	x	x	x
<i>USA Mid Cap, osuuslaji EUR W</i>	x		x				x		x	x	x	x
<b>USA Mid Cap KL</b>												
<i>USA Mid Cap, klasse DKK W d</i>	x		x				x		x	x	x	x

The individual risk factors are explained below. The list of risk factors is not exhaustive as other factors may affect the value of the investments. Furthermore, different parts of the investment market may react differently to these conditions. The impact of a given risk can increase in magnitude in combination with other risks.

**Country-specific risk:** When investing in securities in a single country, investors undertake the specific risk that this specific country may be exposed to special political or regulatory measures. Moreover, special market conditions or economic conditions in this specific country, including the country's currency and interest rate movements, will affect the value of the investments.

**Credit risk:** Within the different bond classes – government bonds, mortgage bonds, emerging market bonds, corporate bonds, credit bonds etc. – credit risk expresses whether the bonds are matched by real values, and whether the issuer is assigned a lower credit rating and/or whether the issuer will be able to fulfil its obligations.

**Counterparty risk:** There may be times when the custodian bank of a sub-fund/unit class is unable to carry out or settle transactions in underlying securities as otherwise agreed. Such situations include, but are not limited to, transactions where the counterparty does not observe the agreed terms and conditions or where the counterparty otherwise fails to honour its obligations. It also encompasses investments in markets which do not operate with simultaneous exchange of securities and cash (payment on delivery). In addition, it encompasses transactions in markets which normally operate with payment on delivery but where other terms and conditions apply to the transaction in question. This involves a risk of loss on the investment. The placing of funds as deposits, derivative financial instruments and depositary receipts such as ADRs and GDRs, securities financing transactions (securities lending, buy/sell-back transactions, buy/sell-back transactions, repo transactions and total return swaps) etc. may involve a

risk that the counterparty is unable to honour his obligations, which will impact the value of the instruments to a greater or lesser degree.

The following countries involve an increased counterparty risk because they do not operate with payment on delivery.

Bosnia and Herzegovina, Botswana, Canada, Egypt, Iceland, India, Israel, Kenya, China (both A and B Shares), Kuwait, Morocco, Oman, Pakistan, Peru, Qatar, Romania, Russia, Sri Lanka, Thailand, Czech Republic, Venezuela, Zambia.

**Bond market risk:** Bond markets may be exposed to specific political or regulatory measures that may affect the value of the investments of a sub-fund/unit class. Moreover, market conditions and economic conditions in general, including global interest rate developments, will affect the value of the investments.

**Interest rate risk:** Interest rates develop differently from region to region and should be considered together with the rate of inflation and other factors. The level of interest rates is an important factor when determining how attractive it is to invest in bonds or other securities, and changes to the level of interest rates may cause prices to rise or fall. When the level of interest rates goes up, bond prices will fall. The concept of duration expresses, among other things, the price risk of the bonds in which investments are made; the shorter the duration, the more stable the price of a bond if interest rates change.

**Default risk:** Bonds with a rating in the “speculative grade” category (lower than BBB-/Baa3) are basically subject to a real risk that the issuer will be unable to meet its payment obligations. A number of factors affect a country’s capacity to pay its debts. Interest and principal payments are made via the government budget, and all factors affecting the government budget thus affect the country’s capacity to pay. One of the principal factors is tax revenues, which depend on factors such as the country’s economic growth, commodity prices and economic growth in the country’s trading partners.

**Risk related to investment style:** If the sub-fund/unit class follows a specific investment style, this may at times result in lower returns. This could be the case if, for example, the sub-fund/unit class (1) has a large share of small caps at times when many equity investors prefer large caps, (2) has a large share of relatively stable equities (low volatility) at times when the stock market is generally rising strongly, (3) has a large share of equities with high dividends.

**Risk related to emerging markets:** The term “emerging markets” covers largely all countries in Latin America, Asia (not including Japan, Hong Kong and Singapore), Eastern Europe and Africa. Political instability, relatively volatile financial markets and economic developments and evolving bond and equity markets are characteristic of emerging markets. Investing in emerging markets may involve particular risks not seen in developed markets. An unstable political system entails a greater risk of sudden and fundamental economic and political changes. For investors, this could mean that assets are nationalised, that the availability of assets is restricted or that government monitoring and control mechanisms are introduced. The currencies are often subject to substantial and unpredictable fluctuations. Some countries may have currency restrictions regarding cross-border currency transfer or may transfer currency with short notice. Market liquidity in emerging markets may be declining as a result of economic or political changes, and such changes may have long-lasting effects.

Special risk concerning investment in China via “Stock Connect”:

Investments in Chinese stocks may take place via “Stock Connect”, which is an investment channel allowing investors to invest in Chinese A shares and gain access to the large Chinese stock market. At the core of the investment channel lies the Hong Kong Stock Exchange, which has built a platform in collaboration with the Chinese stock exchanges in Shanghai and Shenzhen. All three stock exchanges are regulated markets. However, these investments involve a number of risks. Legal aspects, trading aspects and aspects concerning the safekeeping of securities are still subject to uncertainty, and there is a risk of regulatory interference, changed conditions and restrictions. In addition, a sub-fund could

become forced to sell at a month's notice if Dansk Bank is no longer able to support the custody function due to termination by the local custodian bank.

Company-specific risks: The value of a specific security may fluctuate more than the market as a whole and may therefore yield a return that is very different from the market return. Foreign exchange market fluctuations and changes in legislation, competition, market conditions and liquidity may affect corporate earnings. As a sub-fund/unit class may, at the time of investment, invest up to 10 per cent in a single company, the value of the sub-fund/unit class may vary greatly as a result of fluctuations in individual securities. If a company files for bankruptcy, any investment in it will be lost.

Risk related to equity market fluctuations: Equity prices are subject to considerable volatility and may drop significantly. Fluctuations may be a reaction to company-specific, political and regulatory conditions or a consequence of sector-related, regional, local or general market and economic conditions.

Exchange rate risk: Investing in foreign securities involves exposure to currencies, the value of which may fluctuate relative to Danish kroner. Unit classes may be issued in currencies other than Danish kroner, so currency fluctuations should be considered relative to such currencies. Sub-funds/unit classes investing in Danish equities or bonds do not have direct currency exposure, whereas sub-funds/unit classes investing in European equities or bonds have a limited currency risk. Sub-funds/unit classes that are systematically hedged have a very limited currency risk. They may also have a limited risk relative to the benchmark as prices cannot be hedged according to the same method and at the same time as the benchmark. If applied, such a hedge will appear from the sub-fund/unit class report as part of the description of the investment area. Sub-funds with unit classes may also hedge against fluctuations in currencies other than Danish kroner, such as Swedish kronor or euro.

Sustainability risk: Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative impact on the value of the investment.

For a sustainability event or condition to be considered a risk, it must be transformed into investment results, which means it must have a positive or negative impact on the investment through, for example, earnings/costs, the value of liabilities/assets or cost of capital.

Sustainability factors that may adversely affect the value of a specific investment in the sub-funds include, among other things, the following:

- Environment: Energy consumption and efficiency; extreme weather events such as floods and strong winds; pollution incidents; biodiversity or marine habitats damage.
- Social: Inclusion/inequality; labour strikes; health and safety incidents such as injury or death; product safety issues.
- Governance: Tax evasion; discrimination within a workforce; inappropriate remuneration practices; lack of protection of personal data.

The likelihood of a sustainability risk event occurring and the extent to which it may impact the returns of a sub-fund depend on a variety of factors. Consequently, the assessment of the impact sustainability risks are expected to have on a sub-fund's returns is subject to considerable uncertainty. The impact may thus materialise to a greater or lesser extent than expected, depending on the specific situation, other risk factors and the context. Although duly mapped, identified and managed in the investment processes, the following elements may have an impact:

- Sustainability risks are often complex and interlinked, which can make it difficult to assess them in their entirety
- Sustainability risks are usually difficult to quantify and are long-term in nature, and the probability of materialisation thus also depends on the investor's time horizon.

- Sustainability risks, such as risks stemming from changes in physical climate, political action, societal expectation, consumer demand or technological development, can occur at an unexpected scope and magnitude or at an unanticipated pace, which may not be reflected to a full extent when investment decisions are made.
- A lack of ESG market standards in general and a lack of comprehensive or standardised ESG data can make it difficult to uncover all sustainability risks or cause investment decisions to be based on incomplete grounds.
- The sustainability risk assessments can be inaccurate, which may cause the sub-fund to become exposed to greater sustainability risks than anticipated, or to miss investment opportunities, or buy or sell investments at a sub-optimal time.

In the table below, the expected impact sustainability risks may have on a sub-fund's returns is set as "Low", "Medium" or "High". This assessment is based on data from providers specialising in sustainability data.

<b>Sub-fund</b>	<b>Sustainability risks, impact on return</b>
AlmenBolig Korte Obligationer KL	Low
AlmenBolig Mellemlange Obligationer KL	Low
AlmenBolig Obligationer Varighed 2 KL	Low
Danske Obligationer Absolut - Lav Risiko KL	Low
Danske Obligationer Absolut KL	Low
Danske Obligationer Allokering - Akkumulerende KL	Low
Danske Obligationer Allokering KL	Low
Danske Obligationer Varighed 0 – 6 KL	Low
Danske Obligationer Varighed 3 KL	Low
Euro Investment Grade Corp Bonds Restricted KL	Low
Flexinvest Aktier KL	Low
Flexinvest Danske Obligationer KL	Low
Flexinvest Fonde KL	Low
Flexinvest Forvaltning Korte Obligationer KL	Low
Flexinvest Globale Obligationer KL	Medium
Flexinvest Korte Obligationer KL	Low
Flexinvest Lange Obligationer KL	Low
Global Equity Solution - Akkumulerende KL	Low
Global Equity Solution 2 - Akkumulerende KL	Medium
Global Equity Solution KL	Low
Global Sustainable Future 3 KL	Low
Global Restricted KL	Low
Global Sustainable Future Restricted – Accumulating KL	Low
Kommuner 4 KL	Low
Norske Aktier Restricted - Akkumulerende KL	Low
PP Pension Aktieallokeringsfond - Accumulating KL	Low
Tactical Asset Allocation Danmark – Akkumulerende KL	Low
Tactical Asset Allocation Norge – Accumulating KL	Low

<b>Sub-fund</b>	<b>Sustainability risks, impact on return</b>
Tactical Asset Allocation Sverige – Accumulating KL	Low
Tactical Asset Allocation EURO – Accumulating KL	Medium
US High Yield Bonds - Akkumulerende KL	Medium
US High Yield Bonds KL	Medium
USA Mid Cap – Akkumulerende KL	Medium
USA Mid Cap KL	Medium

See section 4 “General information regarding all sub-funds” for additional information on how sustainability risks are integrated in sub-funds.

## **7 Return, dividends, taxation, etc.**

---

### **7.1 Return, dividends and price movements**

#### **7.1.1 Accumulating sub-funds**

The sub-funds do not pay dividends but transfer the profit for the year to the assets. Return on investment in the sub-funds will be reflected in a price change (positive or negative) of the units.

#### **7.1.2 Distributing sub-funds**

The total return of the sub-funds may be generated as dividends and as a change in the unit price.

Dividends are calculated and paid (distributed) to the investors of distributing sub-funds according to the principles described below. Under Danish tax legislation (section 16 C of the Danish Tax Assessment Act), distributing funds are designated as “investment undertakings subject to minimum taxation”.

Price changes produce a change in the current value of the units. A change in the price of units may be positive or negative and varies over time.

To the extent a sub-fund generates income of the relevant kind, the sub-fund will make distributions for the financial year based on:

- interest earned as well as fees for lending of securities;
- dividends earned less withholding tax paid plus withholding tax recovered as well as compensation by the borrower to the lender for dividends not received in respect of stocks borrowed;
- realised capital gains and losses on equity investments (capital gains/losses on equity investments taxed pursuant to section 19 of the Danish Capital Gains Tax Act, however, are taxed in accordance with the mark-to-market principle),
- realised net capital gains on bonds and treasury bills;
- realised net capital gains on foreign currency accounts;
- net capital gains on the use by the sub-fund of derivative financial instruments, calculated according to the mark-to-market principle.

Thus, realised gains are included in the statement of the sub-fund’s minimum income, implying that the minimum income may be negative. In that case, the total negative minimum income for a sub-fund is carried forward to deduction in the statement of the minimum income in the subsequent year.

A sub-fund’s administrative expenses are deducted prior to distribution. Distributions will comply with the requirements of section 16 C of the Danish Tax Assessment Act.

As a consequence of the composition of the dividends, dividend rates can be expected to vary from one year to the next.

Following the annual general meeting of the fund at which the financial statements of the sub-funds, including the amount of total dividends for the financial year, are approved, a final dividend is paid, calculated as the difference between the ordinary dividend for the financial year and the on account dividends paid. Realised net capital gains, if any, are only included in the final dividend.

After the end of the financial year, but prior to the date of the annual general meeting, distributing sub-funds may, at the discretion of the Board of Directors, make dividend distributions complying as a minimum with the requirements of section 16 C of the Danish Tax Assessment Act. If, in exceptional cases, such distribution is not in compliance with the provisions of section 16 C of the Danish Tax Assessment Act, it may be resolved to distribute an additional amount. The size of the distribution must be presented for approval at the annual general meeting.

As a main rule, dividends are paid to unitholders after the annual general meeting of the fund, at which the financial statements of the sub-fund are approved. The dividend rate may be rounded down to the nearest 0.1 of a percentage point of the nominal value of the unit. Any amount not distributed as a result of such rounding down will be carried forward to the following year's distributable amount.

The sub-funds Danske Obligationer Absolut KL, Danske Obligationer Absolut – Lav Risiko KL, Flexinvest Fonde KL, Flexinvest Forvaltning Korte Obligationer KL and Kommuner 4 KL pay a minimum dividend calculated as the year's interest earned, realised net capital gains on bonds (only net profits are included) and earned taxable net capital gains by means of derivative financial instruments less administrative costs.

In the sub-funds AlmenBolig Korte Obligationer KL, AlmenBolig Mellemlange Obligationer KL, AlmenBolig Obligationer Varighed 2 KL, Danske Obligationer Absolut KL, Danske Obligationer Absolut – Lav Risiko KL, Danske Obligationer Varighed 06 KL, Danske Obligationer Varighed 3 KL, Flexinvest Fonde KL, Flexinvest – Lange Obligationer KL and Kommuner 4 KL on account dividends are, however, distributed in mid-September/October in the financial year based on the interest earned and administrative costs incurred in the sub-fund during the period from 1 January to 30 June.

## **7.2 Tax rules**

A brief description is provided below of the taxation applicable for various investor types at 1 January 2022.

The information is of a general nature and special rules and details are not described. The tax treatment depends on each individual investor's circumstances and may change in the future as a result of legislative changes or changes in the investor's circumstances.

Additional information about the rules is available from the fund. Investors requiring more detailed information are advised to consult their own tax advisers.

### **7.2.1 Tax rules for accumulating sub-funds**

#### **7.2.1.1 Taxation of sub-funds**

Accumulating sub-funds are generally not liable to tax, cf. section 3(1) (xix) of the Danish Corporation Tax Act and for private individuals' investment of free funds they are qualified as bond-based investment companies, cf. section 19 C of the Danish Capital Gains Tax Act.

However, Danish share dividends are liable to 15 per cent tax and international dividends are typically liable to 15 per cent tax in the source country. Taxation of foreign dividends depends on the tax rules in the source country and any double-taxation treaty agreement between Denmark and the country in question.

#### **7.2.1.2 Taxation of investors**

*Special rules applying to investors liable to taxation in Denmark*

The sub-funds are covered by section 19 of the Danish Capital Gains Tax Act.

In the case of private investors' available funds, the return on the units will be taxed in accordance with the mark-to-market principle. See section 23 of the Danish Capital Gains Tax Act. The mark-to-market

taxation is based on the difference between the value at the end of the year and at the beginning of the year. The annual gains and losses and any dividends are included in capital income. Losses are deductible if the acquisition has been reported to the Danish Tax Agency. Any dividend distributions will be subject to on-account tax.

Private individuals may not invest free funds in the accumulating sub-funds via a share savings account (aktiesparekonto).

Funds under the Danish Business Tax Scheme are also taxed in accordance with the mark-to-market principle, and the return on the units or any losses are included in the business income under the provisions of the Danish Act on taxation of income of self-employed persons.

In the case of pension assets, the return on the units is taxed annually in accordance with the mark-to-market principle and the rules set out in the Danish Act on Taxation of Pension Returns.

In the case of funds of companies or foundations, gains and losses are included in the taxable income, which is taxed in accordance with the Danish Corporation Tax Act or the Danish Act on Taxable Nonstock Corporations. Gains and losses must be recognised in accordance with the mark-to-market principle.

Purchase and sale of units and year-end holdings are reported to the tax authorities, if trading takes place via a Danish bank or brokers, and the certificates are held in a custody account with a Danish bank.

#### *Special rules applying to investors liable to taxation in Norway*

Below is a brief description of the tax conditions applying to investments in the unit classes for investors liable to tax in Norway.

Based on the composition of equities and other securities in the sub-fund, any gains/losses will be categorised as share and/or interest income and taxed accordingly. The calculation of gains/losses is based on the average of the equity proportion in the year of acquisition and the year of disposal.

The following template will apply:

- When the equity share of the underlying investments in the sub-fund, cash excepted, exceeds 80 per cent, gains/losses are taxed as share income.
- When the equity share of the underlying investments in the sub-fund, cash excepted, is below 20 per cent, gains/losses are taxed as interest income.
- When the equity share of the underlying investments in the sub-fund, cash excepted, is between 20 per cent and 80 per cent, gains/losses are taxed as share income and interest income, respectively, based on a pro-rata distribution.

The equity share is based on the average equity share in the year of acquisition and the year of disposal.

Special transitional rules apply to units acquired prior to 7 October 2015. These will not be described here.

With respect to private investors, any share income/loss will be multiplied by the factor applicable from time to time (adjustment factor) and taxed at applicable rates. Losses are tax deductible. However, parts of the share income will be tax exempt under a shareholder model, the so-called “aksjonærmodellen”, through a tax allowance, the so-called “skjermingsfradrag”, available to unitholders at 31 December. Any unutilised “skjermingsfradrag” may be carried forward, including interest, on the unit. Unutilised “skjerming” will not add to the amount of the loss but only reduce the future income.

A share savings account (“Aksjesparekonto”) allows private investors to defer the tax on share income if the sub-fund has an equity share of more than 80 per cent at 1 January. If larger amounts are withdrawn from the share savings account than what has been deposited and the “skjermingsfradrag”, this excess amount will be taxed as share income.



Interest income is taxed at the rates applicable from time to time, and likewise any losses are deductible. If a loss on an investment triggers a full-year investment loss for the investor, the full-year loss may be carried forward to a subsequent income year.

For private investors resident in Norway, the calculation of tax on capital is based on the market value at 1 January of the assessment year. Investors are granted a valuation reduction on the equity share of the investment certificate.

With respect to company investors, an exemption method (“fritaksmetoden”) applies to income categorised as share income. Generally, the exemption method applies to all sub-funds with a fiscal domicile in the EU/EEA. If a sub-fund domiciled in the EU/EEA is deemed to be domiciled in a low-tax member state, it is, however, a condition for applying the exemption method that it is deemed to have been actually established there.

The exemption method entails that gains are tax exempt and that losses are not deductible.

Any gains classified as interest income are taxed at the rates applicable from time to time, and likewise any losses are deductible.

#### *Special rules applying to investors liable to taxation in Sweden*

Private investors and legal entities liable to tax will be taxed annually on the basis of a standardised income “schablonintäkt”. The basis of calculation is the value of the units at the beginning of the calendar year, and the size of the income is calculated as 0.4 per cent of the basis of calculation. In the case of private investors, the income is taxed as investment income, included under “kapital”, while in the case of legal entities it is taxed as business income, included under “näringsverksamhet”. Special rules apply to units acquired as “lagertillgångar i näringsverksamhet”.

In the case of private investors, taxable gains on the sale of units are reported as investment income, included under “kapital”. Any losses may be offset against taxable gains on shares and other listed securities or bonds etc. in the assessment year, subject to certain restrictions. Any excess losses may be used in the taxation for the year in accordance with special rules. Special tax rules apply to private investors who have acquired units in an “investeringssparkonto”.

In the case of legal entities, taxable gains on the sale of units are usually included as business income. Losses cannot be deducted from other income from “näringsverksamhet” but may be offset against taxable gains on shares and other securities (“delägarätter”). Any unused losses may be carried forward to future assessment years with no limitation in time. Special rules apply to units acquired as “lagertillgångar i näringsverksamhet”.

Special rules also apply to certain types of legal entities.

#### *Special rules applying to private investors liable to taxation in Finland*

Gains on sale of units are taxed as capital income in accordance with the rates in effect at any given time. Losses may be set off against gains pursuant to special rules set out in the Finnish income tax act during the tax year as well as during the next following five tax years. Since 2016, private investors have also been able to set off their losses against their other capital income besides gains as set out in the Finnish income tax act. Gains and losses of EUR 100 or less are neither taxable nor eligible for set-off.

If the investment was made under an agreement on long-term investments under the Finnish act on long-term investments (Laki sidotusta pitkäaikaissäästämisestä 22.12.2009/1183), special taxation rules apply.

In the case of companies, gains and losses are included in the taxable business income, and taxed in accordance with the Finnish Business Tax Act.

## **7.2.2 Tax rules for distributing sub-funds**

### **7.2.2.1 Taxation of sub-funds**

Distributing sub-funds observe the dividend distribution provisions described in **section 7.1**. The distributing sub-funds themselves are exempt from tax payments. See section 1(1)(v)c of the Danish

Corporation Tax Act. However, the sub-fund is subject to a tax rate of 15 per cent on dividends from Danish equities.

In addition, foreign dividends are typically subject to 15 per cent tax in the source country. The amount of tax payable depends on the tax rules in the source country and any double-taxation treaty agreement between Denmark and the country in question.

### **7.2.2.2 Taxation of investors**

*Special rules applying to investors liable to taxation in Denmark*

#### Equity-based sub-funds:

The sub-funds comply with the limits for investment defined in section 21(2) – (3) of the Danish Capital Gains Tax Act.

In the case of private investors' available funds, dividends received from equity sub-funds are taxed as share income. On account tax on dividends will be withheld. Gains on disposal of units in an equity-based sub-fund are also taxed as equity income. Losses may be offset against gains and dividends from listed equities and from unit trust certificates in other equity-based sub-funds and against dividends and net gains on units in equity-based investment companies, cf. section 19 B of the Danish Capital Gains Tax Act. However, it is a condition that the acquisition has been reported to the Danish Tax Agency. Gains and losses are recognised in accordance with the mark-to-market principle.

Private individuals may invest free funds in an equity-based sub-fund via a share savings account (aktiesparekonto).

Assets falling within the Danish Special Taxation of Business Income scheme may not be placed in distributing units as this will be deemed to be a withdrawal of a corresponding amount from the scheme.

In the case of pension assets, the return on the units is taxed annually in accordance with the mark-to-market principle pursuant to the rules set out in the Danish Act on Taxation of Pension Returns.

In the case of funds of companies or foundations, dividends, gains and losses are included in the taxable income, which is taxed in accordance with the Danish Corporation Tax Act or the Danish Act on Taxable Nonstock Corporations. In respect of companies, gains and losses must be included according to the mark-to-market principle, while in respect of foundations, under certain conditions, there is a choice between taxation of gains on realisation and mark-to-market taxation. Tax on account is withheld on distribution of dividends. The above-mentioned tax rules imply that returns obtained by investing in the fund are taxed according to principles more or less similar to those applicable to a direct investment in securities.

Any payment of dividends is reported to the tax authorities. In addition to this, purchase and sale of units and year-end holdings are reported to the tax authorities. However, this only applies, if trading takes place via a Danish bank or brokers, and the units are held in a custody account with a Danish bank.

#### Bond-based sub-funds:

The bond-based sub-funds comply with the limits for investment defined in section 22(2) – (3) of the Danish Capital Gains Tax Act.

In the case of private investors' available funds, dividends received from bond-based sub-funds are taxed as capital income. Unless the sub-fund is 100 per cent bond-based, on account tax on dividends is withheld in connection with distributions. Gains or losses on disposal of units in a bond-based sub-fund are taxed as capital income on realisation. However, it is a condition for tax deductibility that the acquisition has been reported to the Danish Tax Agency.

Private individuals may not invest free funds in a bond-based sub-fund via a share savings account (aktiesparekonto).

Assets falling within the Danish Special Taxation of Business Income scheme may not be placed in distributing units as this will be deemed to be a withdrawal of a corresponding amount from the scheme.

In the case of pension assets, the return on the units is taxed annually in accordance with the mark-to-market principle pursuant to the rules set out in the Danish Act on Taxation of Pension Returns.

In the case of funds of companies or foundations, dividends, gains and losses are included in the taxable income, which is taxed in accordance with the Danish Corporation Tax Act or the Danish Act on Taxable Nonstock Corporations. Gains and losses must be recognised in accordance with the mark-to-market principle.

Any payment of dividends is reported to the tax authorities. In addition to this, purchase and sale of units and year-end holdings are reported to the tax authorities. However, this only applies, if trading takes place via a Danish bank or brokers, and the units are held in a custody account with a Danish bank.

## **8 Subscription and subscription costs**

---

### **8.1 Tap issue**

Units will be issued on a tap basis with no fixed upper limit at the currently calculated subscription price and with customary trading costs, barring market obstacles or technical problems.

### **8.2 Places of subscription**

Units marketed in Denmark can be purchased and sold through all branches of Danske Bank, Denmark:  
Danske Bank A/S  
Corporate Actions, Holmens Kanal 2 – 12, 1092 Copenhagen K, Denmark  
Tel.: +45 45 14 36 94

Orders may be executed by any Danish branch of the bank. Applications may also be submitted through any other Danish banks and stockbrokers.

Units marketed in Norway can be purchased and sold through all branches of Danske Bank, Norway:

Danske Bank, Norway (branch of Danske Bank A/S) Søndre Gate 13-15, N-7466 Trondheim, Norway Tel.: +47 915 08540	Danske Invest Asset Management AS Bryggetorget 4, Pb. 1170 Sentrum, N-0250 Oslo, Norway Tel.: +47 85 40 98 00
---	--

Units marketed in Sweden can be purchased and sold through all branches of Danske Bank, Sweden:

Danske Bank, Sweden (branch of Danske Bank A/S)  
Normalmstorg 1, Box 7523  
S-103 92 Stockholm, Sweden  
Tel: +46 (0) 752-48 45 42

Units marketed in Finland be purchased and sold through all branches of Danske Bank, Finland:  
Danske Bank, Finland (filial af Danske Bank A/S)  
Televisiokatu 1, FI-00075 Helsinki, Finland  
Tel.: +358 (0) 200 2580

### **8.3 Subscription price**

The descriptions of the sub-funds in **section 5** provide information about the pricing method on which the subscription price (issue price) for the individual sub-fund is based.

The subscription price is generally set on the basis of net asset value. The net asset value is calculated by dividing the value of the investors' assets under management at the time of issue by the nominal value of the units subscribed for in the sub-fund. Investors' asset under management are calculated on the basis of the most recently available market prices of the sub-fund's holdings at the time of issue. If those markets are closed, developments may be adjusted to reflect movements in a market future.

The subscription price is set using one of the following methods:

*Single-pricing method*

If the subscription price (issue price) is determined using the single pricing method (see section 5 of the Danish Executive Order no. 757 of 17 June 2014 on calculation of issue and redemption prices for subscription and redemption of units in Danish UCITS, the price will be calculated as the net asset value of the sub-fund.

Net asset value is calculated by dividing the share of the sub-fund's assets under management made up at the time of calculation, corresponding to the share of the joint portfolio from which the unit class receives a return, adjusted for any class-specific assets and costs incumbent on the unit class, by the number of units subscribed for in the unit class.

Settlement of requests for issue of units received by the fund before 12:00 noon Norwegian and Swedish time/ 1:00 pm Finnish time, is effected at the issue price which, barring market obstacles or technical problems, is determined at 2:00 pm Norwegian and Swedish time/ 3:00 Finnish time on the same business day. For unit classes marketed in Norway: If this day is not a business day in Denmark, the issue price will be determined at 2:00 pm (Norwegian time) on the next day which is a business day both in Denmark and Norway. For unit classes marketed in Sweden and Finland: If this day is not a business day in Denmark, the issue price will be determined at 2:00 pm Swedish time/ 3:00 pm Finnish time on the next day which is a business day both in Denmark and Sweden, and Denmark and Finland, respectively. However, in the case of large issues, the issue price may be determined based on actual trading prices later the same day after the sub-fund's purchase of the necessary securities etc. in connection with the issues.

*Modified single pricing method*

If the subscription price (issue price) is determined using the modified single-pricing method, this entails that one or more dates are specified for calculation of the value of the units, cf. section 6 of the Danish Financial Supervisory Authority's Executive Order on Computation of Issue and Redemption Prices in Connection with Subscription for and Redemption of Units in Danish UCITS, etc. To settle requests for issues of units received by the fund, the fund must determine the issue price based on the net asset value at the next time of calculation.

Net asset value is calculated by dividing the share of the sub-fund's assets under management made up at the time of calculation, corresponding to the share of the joint portfolio from which the unit class receives a return, adjusted for any class-specific assets and costs incumbent on the unit class, by the number of units subscribed for in the unit class.

The fund's Board of Directors has determined that the net asset value mentioned above must be adjusted in connection with each net issue by adding a fee to cover trading costs. In connection with each contribution, these will be calculated based on current trading terms (commission, price spread and other trading costs on financial instruments). The current size is specified in **appendix 1**. No costs are incurred for administration, custodian functions or marketing.

Settlement of requests for issue of units received by the fund before 12:00 noon Norwegian and Swedish time/ 1:00 pm Finnish time, is effected at the issue price which, barring market obstacles or technical problems, is determined at 2:00 pm Norwegian and Swedish time/ 3:00 Finnish time on the same business day. For unit classes marketed in Norway: If this day is not a business day in Denmark, the issue price will be determined at 2:00 pm (Norwegian time) on the next day which is a business day both in Denmark and Norway. For unit classes marketed in Sweden and Finland: If this day is not a business day in Denmark, the issue price will be determined at 2:00 pm Swedish time/ 3:00 pm Finnish time on the next day which is a business day both in Denmark and Sweden, and Denmark and Finland, respectively. However, in the case of large issues, the issue price may be determined based on actual trading prices later the same day after the sub-fund's purchase of the necessary securities etc. in connection with the issues.

The maximum issue surcharges stated may be exceeded during periods of abnormal market conditions leading to an increase in “other market-derived costs of purchasing instruments”. If this situation occurs, the fund will post the specific issue surcharge at [www.danskeinvest.dk](http://www.danskeinvest.dk).

#### *Dual pricing method*

If the subscription price (issue price) is set using the dual-pricing method, it is calculated as the net asset value of the sub-fund with the addition of a premium (the subscription fee) to cover the cost of purchasing financial instruments (securities) and necessary costs relating to the issue, cf. section 4 of the Danish Financial Supervisory Authority’s Executive Order on the Calculation of Issue and Redemption Prices for the Subscription and Redemption of Units in Danish UCITS etc.

The net asset value is calculated by dividing the value of the investors’ assets under management at the time of issue by the nominal value of the units subscribed for in the sub-fund. The calculation is made over the course of each day.

The composition and maximum amount of the issue surcharge appear from **appendix 1**. The issue surcharge covers commission, price spread and other trading costs on the financial instruments. No costs are incurred for administration, custodian functions or marketing. The subscription price is rounded off in accordance with the tick sizes applied by Nasdaq Copenhagen A/S for investment funds.

The maximum issue surcharges stated may be exceeded during periods of abnormal market conditions leading to an increase in “other market-derived costs of purchasing instruments”. If this situation occurs, the fund will post the specific issue surcharge at [www.danskeinvest.dk](http://www.danskeinvest.dk). Any changes will furthermore be published through a company announcement via Nasdaq Copenhagen A/S.

### **8.4 Payment for subscription and custody services**

#### *Concerning units subscribed in DKK and units subscribed in other currencies using the double-pricing method*

Units subscribed for on a tap basis are settled on the second business day after subscription at the same time as the units are registered in VP accounts.

Units are kept in custody by Danish banks free of charge. However, the usual VP fees apply when transferring units to and from the account.

#### *Concerning units subscribed in NOK using the single-pricing method*

Units subscribed for on a tap basis will be settled for the unit classes on the second day following subscription which is a business day both in Denmark and Norway. The units will at the same time be registered in the investor’s custody account.

The applicable rates of the relevant bank apply to keeping units in custody.

#### *Concerning units subscribed in SEK using the single-pricing method*

Units subscribed for on a tap basis will be settled on the first day following subscription which is a business day both in Denmark and Sweden. The units will at the same time be registered in the investor’s custody account.

The applicable rates of the relevant bank apply to keeping units in custody.

#### *Concerning units subscribed in EUR using the single-pricing method*

Units subscribed for on a tap basis will be settled on the first day following subscription which is a business day both in Denmark and Finland. The units will at the same time be registered in the investor’s custody account.

The applicable rates of the relevant bank apply to keeping units in custody.

### **8.5 Issue and redemption prices, etc.**

Danske Invest Management A/S calculates and provides information (barring market obstacles or technical problems) on current issue and redemption prices and net asset value. Moreover, price

information is available in certain daily newspapers, at [www.danskeinvest.dk](http://www.danskeinvest.dk), [www.danskeinvest.com](http://www.danskeinvest.com) and at [www.nasdaqomxnordic.com](http://www.nasdaqomxnordic.com).

## **9 Sale, redemption and redemption costs**

---

### **9.1 Negotiability and redemption**

The units are freely negotiable, but see the investor restriction in **section 5**.

The redemption price is generally set on the basis of net asset value. The net asset value is calculated by dividing the value of the investors' assets under management at the time of redemption by the nominal value of the units subscribed for in the sub-fund. Investors' asset under management are calculated on the basis of the most recently available market prices of the sub-fund's holdings at the time of redemption. If those markets are closed, developments may be adjusted to reflect movements in a market future.

If an investor wishes to sell units in a sub-fund/unit class of the fund in order to purchase units in another sub-fund, the trading terms of the bank selected by the investor will apply.

An agreement has been entered into with Danske Bank A/S to the effect that, barring market obstacles or technical problems, units may be purchased and sold through the bank.

Units must be purchased and sold through Danske Bank A/S or via Nasdaq Copenhagen A/S. Units may not be purchased or sold directly through the fund's investment management company.

No investor is under an obligation to have his units redeemed either in full or in part.

The fund is under an obligation to redeem units if requested by an investor. However, the fund may require the redemption to be postponed, see article 16(9) of the articles of association,

- where the fund cannot determine the net asset value due to market conditions; or
- where, in order to ensure equal treatment of investors, the fund cannot determine the redemption price until the fund has realised the assets necessary for redeeming the units.

A sell-back or redemption of units can take place through the custodian against payment of standard trading costs.

The descriptions of the sub-funds in **section 5** provide information about the pricing method on which the redemption price for the individual sub-fund is based. The subscription price is set using one of the following methods:

#### *Single-pricing method*

If the redemption price is determined using the single pricing method (see section 5 of the Danish Executive Order no. 757 of 17 June 2014 on calculation of issue and redemption prices for subscription and redemption of units in Danish UCITS, the price will be calculated as the net asset value.

Net asset value is calculated by dividing the share of the sub-fund's assets under management made up at the time of calculation, corresponding to the share of the joint portfolio from which the unit class receives a return, adjusted for any class-specific assets and costs incumbent on the unit class, by the number of units subscribed for in the class.

The redemption price thus calculated is rounded off. See section 22. *Registration, denomination and price specification of units.*

Settlement of requests for redemption of units received by the fund before 12:00 noon Norwegian and Swedish time/ 1:00 pm Finnish time, is effected at the redemption price which, barring market obstacles or technical problems, is determined at 2:00 pm Norwegian and Swedish time/ 3:00 Finnish time on the same business day. For unit classes marketed in Norway: If this day is not a business day in Denmark, the redemption price will be determined at 2:00 pm (Norwegian time) on the next day which is a business day both in Denmark and Norway. For unit classes marketed in Sweden and Finland: If this day is not a business day in Denmark, the redemption price will be determined at 2:00 pm Swedish

time/ 3:00 pm Finnish time on the next day which is a business day both in Denmark and Sweden, and Denmark and Finland, respectively. However, in the case of large redemptions, the redemption price may be determined based on actual trading prices later the same day after the sub-fund's sale of the necessary securities etc. in connection with the redemption.

#### *Modified single pricing method*

If the redemption price is determined using the modified single-pricing method, this entails that one or more dates are set for calculating the value of the units. For the settlement of requests for redemption of units received by the fund, the fund must determine the redemption price based on the net asset value on the calculation date, cf. section 6 of the Danish Financial Supervisory Authority's Executive Order on the Calculation of Issue and Redemption Prices for Subscription for and Redemption of Units in Danish UCITS, etc.

Net asset value is calculated by dividing the share of the sub-fund's assets under management made up at the time of calculation, corresponding to the share of the joint portfolio from which the unit class receives a return, adjusted for any class-specific assets and costs incumbent on the unit class, by the number of units subscribed for in the unit class.

The fund's Board of Directors has determined that the net asset value mentioned above must be adjusted in connection with each net redemption by subtracting a fee to cover trading costs. In connection with each redemption, these will be calculated based on current trading terms (commission, price spread and other trading costs on financial instruments). The current size is specified in **appendix 2**. No costs are incurred for administration, custodian functions or marketing.

Settlement of requests for redemption of units received by the fund before 12:00 noon Norwegian and Swedish time/ 1:00 pm Finnish time, is effected at the redemption price which, barring market obstacles or technical problems, is determined at 2:00 pm Norwegian and Swedish time/ 3:00 Finnish time on the same business day. For unit classes marketed in Norway: If this day is not a business day in Denmark, the redemption price will be determined at 2:00 pm (Norwegian time) on the next day which is a business day both in Denmark and Norway. For unit classes marketed in Sweden and Finland: If this day is not a business day in Denmark, the redemption price will be determined at 2:00 pm Swedish time/ 3:00 pm Finnish time on the next day which is a business day both in Denmark and Sweden, and Denmark and Finland, respectively. However, in the case of large redemptions, the redemption price may be determined based on actual trading prices later the same day after the sub-fund's sale of the necessary securities etc. in connection with the redemption.

The maximum redemption discount stated may be exceeded during periods of abnormal market conditions leading to an increase in "other market-derived costs of selling instruments". If this situation occurs, the fund will post the specific redemption discount at [www.danskeinvest.dk](http://www.danskeinvest.dk) during the relevant period.

#### *Dual pricing method*

If the redemption price is determined using the dual-pricing method, the price is calculated as the net asset value of the sub-fund less a deduction (the redemption discount) to cover the cost of selling financial instruments (securities) and necessary costs relating to the redemption, cf. section 4 of the Danish Financial Supervisory Authority's Executive Order on the Calculation of Issue and Redemption Prices for the Subscription and Redemption of Units in Danish UCITS etc.

The net asset value is calculated by dividing the value of the investors' assets under management at the time of redemption by the nominal value of the units subscribed for in the sub-fund. The calculation is made over the course of each day.

The composition and maximum amount of the redemption discount appear from **appendix 2**. The issue surcharge covers commission, price spread and other trading costs on the financial instruments. No costs are incurred for administration, custodian functions or marketing. The redemption price thus calculated is rounded off in accordance with the tick sizes applied by Nasdaq Copenhagen A/S for investment funds.

The maximum redemption discount stated may be exceeded during periods of abnormal market conditions leading to an increase in “other market-derived costs of selling instruments”. If this situation occurs, the fund will post the specific redemption discount at [www.danskeinvest.dk](http://www.danskeinvest.dk) during the relevant period. Any changes will furthermore be published through a company announcement via Nasdaq Copenhagen A/S.

#### *Switch*

In sub-funds where there is a W class and a W d class, and both classes are issued in the same currency, investors may switch between these two unit classes of the sub-fund without incurring additional costs at net asset value. Investors may only switch to a different class if the investor is eligible to invest in this class.

The switch must be made at 31 March or 30 September. Any wish to switch must be communicated to the association by noon 10 business days before the date of the switch.

It should be noted that a switch is still a sale and a purchase, which means it may have tax implications, and the investor’s bank may charge the usual transaction costs, etc.

A switch can only be made through Danske Bank A/S, and it cannot be made directly through the association’s investment management company.

In all other situations, a sale of one unit class and the purchase of another unit class is treated as any other separate sale and separate purchase and is considered two separate transactions, which are priced in accordance with the general principles for a purchase and a sale, respectively.

## **9.2 Settlement in connection with redemption**

*Concerning units redeemed in DKK and units redeemed in other currencies using the double-pricing method*

Units will be settled on the second business day after pricing.

*Concerning units redeemed in NOK using the single-pricing method*

Units will be settled for the unit classes on the second day following pricing which is a business day both in Denmark and Norway.

*Concerning units redeemed in SEK using the single-pricing method*

Units will be settled on the first business day following pricing which is a business day both in Denmark and Sweden.

*Concerning units redeemed in EUR using the single-pricing method*

Units will be settled on the first business day following pricing which is a business day both in Denmark and Finland.

## **9.3 Registration, denomination and price specification of units**

The units are negotiable instruments.

*For units issued in DKK and units issued in other currencies using the double-pricing method*

Units are issued through VP Securities A/S in denominations of DKK 100 or multiples thereof. For units issued in EUR, the minimum size is EUR 0.000001 and the price specification by nominal is EUR 10.

The subscription price and the redemption price are rounded off in accordance with the tick sizes applied by Nasdaq Copenhagen A/S for investment funds.

*For units issued in SEK using the single-pricing method*

The minimum size of the units is SEK 0.000001 and the price specification by nominal is SEK 100.

Units are issued through VP Securities A/S. Danske Bank is the certificate-issuing institution relative to VP Securities A/S. The subscription price and the redemption price are rounded to two decimal places.



*For units issued in NOK using the single-pricing method*

The minimum size of the units is NOK 0.0001 and the price specification by nominal is NOK100.

Units in unit classes are issued via Euronext Securities (ES) in Norway. Danske Invest Asset Management AS in Norway (subsidiary of Danske Bank A/S) is the certificate-issuing institution with respect to ES.

*For units issued in EUR using the single-pricing method*

The minimum size of the units is EUR 0.000001 and the price specification by nominal is EUR 10.

Units are issued through VP Securities A/S. Danske Bank is the certificate-issuing institution relative to VP Securities A/S. The subscription price and the redemption price are rounded to two decimal places.

However, for the units mentioned below, the following applies:

<b>Share class</b>	<b>Lowest denomination</b>	<b>Price specification, nominal amount of</b>
Euro Investment Grade Corporate Bonds Restricted, klasse DKK d	DKK 10,000	DKK 10,000
Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d	DKK 10,000	DKK 10,000
Global Sustainable Future Restricted – Accumulating KL	EUR 100	EUR 100
Norske Aksjer Institusjon Restricted, klasse NOK I	NOK 1,000	NOK 1,000
US High Yield Bonds KL	DKK 10,000	DKK 10,000

#### **9.4 Admission to trading**

The following sub-funds/unit classes have been admitted to trading in the marketplace for investment fund units of Nasdaq Copenhagen A/S, the so-called IFX.

- *Euro Investment Grade Corporate Bonds Restricted, klasse DKK d*
- *Global Sustainable Future 3, klasse DKK d*
- *Kommuner 4 KL*

Units not admitted for trading on a stock exchange or in an authorised market place may be traded via Danske Bank, cf. **section 8.2 Place of subscription**.

## **10 Operation, business partners and current costs**

---

### **10.1 Management**

Danske Invest Management A/S is in charge of the day-to-day management according to agreement with the fund. See **section 3.4. The Fund's investment management company**.

For each sub-fund/unit class, the total administrative costs, including costs relating to the Board of Directors, management, investment advisory services, IT, auditors, supervision, marketing and the custodian may not exceed 2.0 per cent of the average value of assets under management of the sub-fund/unit class in the financial year.

For the following sub-funds, total administrative expenses may not exceed the percentage of the average asset value of the sub-fund/unit class during the financial year stated in the table.

<b>Sub-fund/Unit class</b>	<b>Per cent</b>
AlmenBolig Korte Obligationer KL	1.00
AlmenBolig Mellemlange Obligationer KL	1.00
AlmenBolig Obligationer Varighed 2 KL	1.00
Danske Obligationer Absolut – Lav Risiko KL	1.00
Danske Obligationer Absolut KL	1.00
Danske Obligationer Allokering – Akkumulerende KL	1.00
Danske Obligationer Allokering KL	1.00
Danske Obligationer Varighed 0-6 KL	1.00
Danske Obligationer Varighed 3 KL	1.00
Euro Investment Grade Corporate Bonds Restricted KL	1.50
Flexinvest Danske Obligationer KL	1.00
Flexinvest Forvaltning Korte Obligationer KL	1.00
Flexinvest Globale Obligationer KL	1.50
Flexinvest Korte Obligationer KL	1.50
Kommuner 4 KL	1.00
PP Pension Aktieallokeringsfond – Accumulating KL	1.00
Norske Aktier Restricted – Akkumulerende KL	1.50
US High Yield Bonds – Akkumulerende KL	1.50
US High Yield Bonds KL	1.50

The administrative costs specified do not include trading costs.

Selling and information costs are included in the total administrative costs.

The total administrative costs of the sub-funds as a percentage of the average assets for the past five years are shown in **appendix 4**.

The commission costs, etc. specified in **section 10.6 Portfolio manager** are not included in the administrative expense ratios. The same applies to issue costs specified in **section 10.4. Custodian**, as these are financed by issue income.

## **10.2 Costs for the Board of Directors and the Danish Financial Supervisory Authority**

The fund's total costs for the Board of Directors and the Danish Financial Supervisory Authority for 2021 are shown in the table below.

	<b>Board of Directors DKK'000</b>	<b>The Danish Financial Supervisory Authority DKK'000</b>
Investeringsforeningen Danske Invest Select	577	547

Remuneration of the Board of Directors qualifies as a shared cost.

Remuneration of the Danish Financial Supervisory Authority is determined by the Financial Supervisory Authority at the end of the calendar year.

The remuneration of the Management Board is included as part of the total remuneration of the fund's investment management company. See **section 10.3. Fee to investment management company**.

The remuneration of the Board of Directors, the Management Board and the Danish Financial Supervisory Authority is included in the administration fee payable to the investment management company.

### **10.3 Fee to investment management company**

The fee payable to the fund's management company, Danske Invest Management A/S, consists of an administration fee and a management fee. The fees are specified in **appendix 3**.

The administration fee covers payment for the investment management company's day-to-day management of the fund and the fund's other costs, including in relation to the Board of Directors, Management Board, auditors, the Danish Financial Supervisory Authority and other public authorities, stock exchange, general meetings, register of unitholders, market making, RI advice, administrative services relating to marketing activities, VP Investor Services A/S, fees to the custodian bank for the custodian tasks, etc. and usual banking services.

The commission costs, etc. specified in **section 10.6 Portfolio manager** are not included in the administration fee. The same applies to issue costs specified in **section 10.4. Custodian**, as these are financed by issue income.

The management fee covers payment for portfolio management as described in **section 10.6 Portfolio manager** and for some sub-funds/unit classes the arrangement of the sale discussed in **section 10.5 Agent**.

The fund may terminate the agreement with immediate effect, always provided that, in case of a notice period shorter than six months, the fund must pay the difference between six months' ordinary payments and the payment during the actual notice period.

The company may terminate the agreement at 18 months' notice to expire at the end of a financial year.

The company has re-delegated the following tasks to Danske Bank A/S: registration tasks, certain bookkeeping, control and reporting tasks, net asset value calculation and marketing, communication and IT tasks.

For the sub-fund PP Pension Aktieallokeringsfond - Accumulating KL, see **section 10.9**.

### **10.4 Custodian**

J.P. Morgan SE - Copenhagen Branch, branch of J.P. Morgan SE, Germany  
Kalvebod Brygge 39,  
1560 Copenhagen V  
Denmark  
Company reg. (CVR) no. 39 96 62 63

The fund has entered into an agreement with J.P. Morgan SE – Copenhagen Branch, branch J.P. Morgan SE, Germany, to the effect that J.P. Morgan SE as the custodian or third party to whom the safekeeping has been delegated will manage and safekeep the fund's financial instruments. The safekeeping is in accordance with legislation, including the Danish Financial Business Act and the Danish Investment Associations, etc. Act.

The custodian is liable for any loss by the fund or the investors of the fund's financial instruments held by the custodian or others on behalf of the fund. The custodian is not liable if such loss is caused by an external event which the custodian could not reasonably be expected to control and the consequences of which would have been unavoidable even if the custodian had taken all reasonable precautions.

An overview of third parties to whom the safekeeping task has been delegated is available on [www.danskeinvest.dk](http://www.danskeinvest.dk).

The custodian is also under an obligation to perform a number of control tasks, including to ensure that

- units of the investors of a sub-fund are issued, redeemed and cancelled in compliance with the provisions of the Danish Investment Associations, etc. Act and the articles of association or the fund rules/instrument of incorporation;
- the net asset value (NAV) of each unit is calculated in accordance with applicable law and the articles of association of the fund;
- any consideration relating to transactions performed by a sub-fund are delivered to the sub-fund within the usual time limits applied at the relevant market;
- dividend payments or retention of earnings to increase the assets under management must take place in accordance with the fund's articles of association; and
- the sub-fund's purchase and sale of financial instruments comply with section 70 of the Danish Investment Associations, etc. Act.

The custodian is furthermore required to monitor the cash flows of the sub-funds.

Reference is generally made to the obligations of the custodian pursuant to legislation, including the Danish Financial Business Act.

*Consideration to the custodian:*

	<b>Price per annum</b>	<b>Fee</b>
Minimum fee	DKK 18,000 + VAT	Per sub-fund
Fee calculated on the basis of the assets under management (highest rate)	0.0025 per cent plus VAT	Per sub-fund
Safekeeping fee (range)*	0.0005 per cent to 0.35 per cent	Per sub-fund
Other fees	Depending on transaction type and service	Per sub-fund

\* *Consideration dependent on complexity of market in question.*

The fee payable to the custodian is included in the administration fee payable to Danske Invest Management A/S. See section **11.3. Fee to investment management company**. For the sub-fund PP Pension Aktieallokeringsfond - Accumulating KL, the fee to the custodian is paid by the sub-fund.

The fund may terminate the agreement at 30 days' notice, unless otherwise agreed or grounds for termination without notice arise as stipulated in the custodian agreement. The agreement may be terminated by the custodian giving nine months' notice.

## 10.5 Pricing

The fund's investment management company has entered into an agreement with Danske Bank A/S to the effect that the bank will act as a market maker in the sub-funds' units on an ongoing basis – subject to special circumstances – in order to enhance the liquidity in the trading of units. Market making must include bid and ask prices based on current issue and redemption prices. The annual fee for this is DKK 2.1 million and covers market making in the relevant sub-funds of the funds managed. The fee is included in the administration fee payable to Danske Invest Management A/S. See **section 10.3**.

The agreement may be terminated by either party at six months' notice.

## 10.6 Agent:

Danske Bank A/S

Holmens Kanal 2 – 12, 1092 Copenhagen K, Denmark

The fund's investment management company has entered into an agreement with Danske Bank A/S to the effect that, at any time, based on customer needs, the bank will arrange sales of units in the sub-funds of the fund. The bank will determine its marketing initiatives with a view to promoting sales of

the fund's units, and, concurrently with the bank, the fund may launch a unit marketing campaign of its own.

The agreement entails that Danske Bank A/S may enter into agreements on arranging sales of units in the fund's sub-funds with other banks, etc. (third-party distributors), including foreign entities of Danske Bank A/S.

The agreement also entails that, through its Investment Line (tel. +45 5585 0435), Danske Bank A/S offers advice to investors banking with banks that have not entered into any agent agreement regarding the fund.

Costs regarding distribution are specified in **appendix 8** and are included in the management fee specified in **appendix 3**.

For the sub-fund PP Pension Aktieallokeringsfond - Accumulating KL, see **section 10.9**.

## 10.7 Portfolio manager

The fund's investment management company has delegated the portfolio management task to Danske Bank A/S (affiliated with the management company), whose principal activity is banking operations and asset management.

The agreement entails that Danske Bank A/S, as portfolio manager, will effect any transactions it may consider beneficial as part of the portfolio management. The aim is to optimise returns while taking into consideration the necessary risk diversification. The portfolio management, including the execution of transactions, must be provided in accordance with the guidelines issued by the fund's Board of Directors.

The portfolio manager has made agreements on asset management collaboration with the following companies:

Sub-fund	Companies	Principal activities
Norske Aktier Restricted – Akkumulerende KL	Danske Invest Asset Management A/S Bryggetorget 4, Pb. 1170 Sentrum, N-0250 Oslo, Norway	Asset management
US High Yield Bonds - Akkumulerende KL	Loomis, Sayles & Company, L.P One Financial Center, Boston, MA 02111, USA	Asset management
US High Yield Bonds KL	Loomis, Sayles & Company, L.P One Financial Center, Boston, MA 02111, USA	Asset management
USA Mid Cap – Akkumulerende KL	Principal Global Investors, LCC (Edge Asset Management – division of Principal Global Investors LCC), 801 Grand Avenue, Des Moines, IA 50392, USA	Asset management
USA Mid Cap KL	Principal Global Investors, LCC (Edge Asset Management – division of Principal Global Investors LCC), 801 Grand Avenue, Des Moines, IA 50392, USA	Asset management

The portfolio manager will pay all costs associated with such work.

The portfolio manager is responsible for ensuring that the companies above comply with the investment guidelines defined.

The portfolio manager guarantees that the companies above are authorised to provide investment advisory services and are subject to financial supervision in their respective jurisdictions.

The fund may from time to time decide that the portfolio manager must immediately discontinue the collaboration with the companies above.

The agreement may be terminated by either party giving six months' notice. However, the management company may terminate the agreement without notice if so warranted by considerations for the investors or if required by the Danish FSA.

Transactions will be executed at net market prices with addition/deduction of the standard commission applied in the market in which the portfolio managers execute the transactions through recognised brokers. Taxes, foreign costs, settlement fees, etc. are not included.

The portfolio management fee is included in the management fee specified in **appendix 3**.

The fees payable to Danske Bank A/S are shown in **Appendix 5**. For the sub-fund PP Pension Aktieallokeringsfond - Accumulating KL, see **section 10.9**.

Each sub-fund's expected costs of purchasing and selling instruments are specified in the columns "Commission and all other direct trading costs of purchasing/selling instruments" and "other market-derived costs of purchasing/selling instruments" in **appendices 1 and 2**.

## **10.8 Specific information regarding sub-fund PP Pension Aktieallokeringsfond - Accumulating KL**

### **10.8.1 Management**

The fee payable to the fund's management company, Danske Invest Management A/S, consists of an administration fee.

The administration fee covers payment for the investment management company's day-to-day management of the fund and the fund's other costs, including in relation to the Board of Directors, Management Board, the Danish Financial Supervisory Authority and other public authorities, stock exchange, general meetings, register of unitholders, market making, RI advice, VP Investor Services A/S, and usual banking services.

Fees to the custodian bank for custodian tasks are paid directly by the fund. See applicable fees in section **10.4 Custodian**.

The following rates apply for management services and fees for custody services payable by unitholders:

<b>Share class</b>	<b>Management fee, % per annum</b>	<b>Custody services fee, % per annum</b>
PP Pension Aktieallokeringsfond - Accumulating Class A	0.04	0.0075
PP Pension Aktieallokeringsfond - Accumulating Class I	0.04	0.0075

<sup>1)</sup> To this amount is added a payment of DKK 10,000 per year.

The commission costs etc. specified in section **10.6. Portfolio manager and adviser** are not included in the total expense ratio. The same applies to issue costs specified in **section 10.4. Custodian**, as these are financed by issue income.

The fund may terminate the agreement with immediate effect, always provided that, in case of a notice period shorter than six months, the fund must pay the difference between six months' ordinary payments and the payment during the actual notice period.

The company may terminate the agreement at 18 months' notice to expire at the end of a financial year.

The company has re-delegated the following tasks to Danske Bank A/S: registration tasks, certain bookkeeping, control and reporting tasks, net asset value calculation and marketing, communication and IT tasks.

### 10.8.2 Agent

The sub-fund uses the following agent:

PP Pension Fondförsäkring AB

Box 7760, Kammakargatan 22, S-103 96 Stockholm

Sweden

The fund's management company has concluded an agreement with PP Pension Fondförsäkring AB on sale/distribution of units in unit class PP Pension Aktieallokeringsfond - Accumulating Class A in connection with PP Pension Försäkringsförening's unit link product.

The fee for unit class PP Pension Aktieallokeringsfond - Accumulating Class A totals 0.57 per cent p.a. of the average assets.

### 10.8.3 Fee to portfolio adviser

The fee is calculated based on total assets and is payable by the sub-fund as follows:

Share class	Fee for portfolio advisory services <sup>1)</sup>
PP Pension Aktieallokeringsfond - Accumulating Class A	Approx. 0.0375
PP Pension Aktieallokeringsfond - Accumulating Class I	Approx. 0.0375

1) The fee for portfolio advisory services is fixed as a residual, such that total costs for the unit class excluding fees for sales will be 0.12 % p.a.

### 10.8.4 Total fee

The total fee charges to the sub-fund will be as follows:

Share class	Total fee
PP Pension Aktieallokeringsfond - Accumulating Class A	0.69
PP Pension Aktieallokeringsfond - Accumulating Class I	0.12

## 11 Rights, articles of association and financial reporting matters, etc.

---

### 11.1 Registered units

Units are issued to bearer but may upon request made to the account-holding institution be registered in the name of the holder in the fund's register of unitholders, which is kept by VP Investor Services A/S and Euronext Securities, Oslo, respectively. However, units held in custody with Danske Bank A/S are automatically registered by name in the register of unitholders.

## **11.2 Voting rights and other rights**

Each investor is entitled to one vote for each unit of DKK 100 nominal value.

In sub-funds/unit classes denominated in other currencies, the number of votes are calculated by multiplying the nominal value of the investor's number of units by the officially quoted exchange rate against DKK on Danmarks Nationalbank's (central bank) published list of exchange rates 30 days prior to the general meeting and dividing this result by 100. The number of votes thus calculated is rounded down to the nearest integer. However, each investor has at least one vote.

Voting rights may be exercised only for units registered to the name of the investor in the fund's register at least one week prior to the general meeting.

No holders of units may on their own behalf and under instruments of proxy cast votes in respect of more than 1 per cent of the total nominal value of units outstanding from time to time in the sub-fund to which the voting relates, or when voting on common issues, 1 per cent of the total nominal value of all sub-funds.

No units carry special rights.

## **11.3 Dissolution of the fund, a sub-fund or a unit class**

Dissolution of the fund, a sub-fund or a unit class may be resolved by the general meeting by a qualified majority. See article 21 of the articles of association.

## **11.4 Articles of association, annual report, key investor information and holdings statement**

The fund's articles of association are an integral part of this prospectus and they must accompany the prospectus on distribution.

Furthermore, a key investor information document is prepared for each sub-fund and unit class, providing an overview of the most significant information about a sub-fund or unit class. The key investor information document and the most recent annual report and interim report may be obtained free of charge from the office of the fund and are available at [www.danskeinvest.dk](http://www.danskeinvest.dk) or [www.danskeinvest.com](http://www.danskeinvest.com).

Additional information about the sub-funds' portfolio is available at [www.danskeinvest.dk](http://www.danskeinvest.dk). This website provides monthly portfolio lists for each sub-fund. These portfolio lists are prepared with a delay of one month.

## **11.5 Temporary financing**

The fund has obtained the approval of the Danish Financial Supervisory Authority allowing the sub-funds to raise loans for temporary financing of transactions entered into. See article 7 of the articles of association.

## **12 Securities financing transactions and collateral security**

---

In the descriptions of the individual sub-funds in **section 5 Sub-fund descriptions**, it is specified whether the sub-funds may use derivative financial instruments and engage in securities lending. When using derivative financial instruments or engaging in securities lending, the sub-funds may use securities financing transactions with a view to ensuring effective portfolio management in order that the individual sub-funds may comply with the investment objective, improve the return and/or mitigate the risk.

Securities financing transactions are defined in the SFT regulation (Regulation 2015/2365 of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012) as securities lending, buy/sell-back transactions, sell/buy-back transactions, repurchase transactions or margin lending transactions and Total Return Swaps and may be used within the framework of the restrictions applicable to the individual sub-funds and the rules applicable from time to time in the area.



All sub-funds under the fund may engage in securities lending and repurchase transactions.

The risk exposure of each individual sub-fund is set out in **section 6**. If a sub-fund has a risk exposure related to securities financing transactions, this will be stated under “counterparty risk”.

Assets received in connection with securities financing transactions and any collateral security received will be held in a depository or in an account with the custodian. See also **section 10.4 Custodian**.

### **12.1 Securities lending**

Securities lending comprises transactions by which the sub-fund transfers (lends) securities to a borrower subject to a commitment that the borrower will return equivalent securities on a future date or when requested to do so by the sub-fund.

As regards securities lending, agreements may be made with the following counterparty:

Danske Bank A/S

Holmens Kanal 2-12, 1092 Copenhagen K, Denmark

The securities lent may not exceed 27 per cent of a sub-fund’s assets under management, and the value of collateral security may not exceed 30 per cent of a sub-fund’s assets under management.

Any return in connection with securities lending transactions for the individual sub-funds will be distributed in accordance with **section 5 “Sub-fund descriptions”**.

Any collateral security provided in connection with securities lending transactions must comply with the following criteria:

- a) Bonds issued by sovereigns, local authorities, special supranational authorities, mortgage credit institutions or similar issuers/issues with a rating of AA or higher from Standard and Poor’s or Fitch or Aa2 or higher from Moody’s.
- b) The amount of the issue must be at least DKK 1 billion or an equivalent amount in another currency.

The fund must ensure that it may at any time revoke any securities lending transaction or terminate any agreement made by the fund in terms of securities lending.

On the date of updating of this prospectus, no sub-funds of the fund engages in securities lending transactions.

### **12.2 Repurchase transactions**

A repurchase transaction is a transaction governed by an agreement by which a counterparty transfers securities where the agreement does not allow a counterparty to transfer or pledge a particular security to more than one counterparty at a time, subject to a commitment to repurchase them, or substituted securities of the same description, at a specified price on a future date specified, or to be specified, by the transferor, being a repurchase agreement for the counterparty selling the securities and a reverse repurchase agreement for the counterparty buying them.

In principle, repurchase transactions may not exceed 100 per cent of a sub-fund’s assets under management. Repurchase transactions must respect the restrictions following from the ESMA guidelines 2014/937.

On the date of updating of this prospectus, no sub-funds of the fund are engaged in repurchase transactions.

### **12.3 Criteria used in the selection of counterparties**

The criteria used for the selection of counterparties in securities financing transactions is as a minimum that the counterparty must be a credit institution as defined in the Danish Investment Associations, etc. Act.

In addition, the credit institution must generally comply with the criteria set out below:

Country of origin: The credit institution must have its registered address in a member state of the European Union, a country with which the European Union has made an agreement in the financial

area, or another country whose credit institutions are subject to or comply with supervisory rules deemed by the Danish Financial Supervisory Authority to be at least as restrictive as EU regulation. However, it is not permitted to use US counterparties or European branches of US entities.

**Minimum credit rating:** The credit institution must be rated at least Baa3/BBB- or higher according to the official rating agencies. If a given counterparty is rated by all the three large rating agencies, Moody's, Standard & Poor's and Fitch, the middle one of the three ratings is used for determining whether the rating criterion is met. If the counterparty is only rated by one or two of the large rating agencies, the lower rating will be used.

If the counterparty is subsequently downgraded by the official credit rating agencies so that the counterparty no longer complies with the minimum requirement, a risk assessment and recommendation must be prepared for the Board of Directors with respect to the fund in question for the next ordinary board meeting with a view to either continuing transactions with this credit institution or closing the transactions.

If the credit institution is not rated by one or more of the official agencies, the credit institution may be recommended for approval by the Board of Directors of the fund in question.

#### **12.4 Policy on collateral security**

Any collateral security used in securities financing transactions to mitigate the risk of counterparty exposure must at all times comply with the following criteria:

- a) **Liquidity:** Any collateral security received, except for cash, must be highly liquid and be traded on a regulated market or a multilateral trading facility with transparent pricing.
- b) **Valuation:** Any collateral security received must be valued at least once daily, and assets exhibiting high price volatility will not be accepted as security, unless haircuts (safety margins) are introduced based on a sufficiently conservative estimate.
- c) **Issuer's credit quality:** Any collateral security provided must be of high quality.
- d) **Correlation:** Any collateral security received by a sub-fund must be issued by an entity which is independent of the counterparty and which is not expected to have a high degree of correlation with the counterparty's credit quality.
- e) **Diversification of collateral security (concentration of assets):** Any collateral security provided must be adequately diversified. This criterion is deemed to be met if a sub-fund receives from a counterparty collateral security with an exposure against a given issuer of not more than 20 per cent of the sub-fund's assets under management. However, a sub-fund may be fully covered in different issues made or guaranteed by an EU member state, local authorities, a third country or an organisation to which one or more EU member states belong. In such case, an issue must not exceed 30 per cent of the sub-fund's assets under management, and at least six issues must be received.
- f) **Risk:** Risks in connection with the management of collateral security, including operational and legal risks, must be identified, managed and mitigated by the risk management process.
- g) **Assignment of rights:** In the event of an assignment of rights, the collateral security received must be held by the sub-fund's custodian. For other types of schemes, the collateral security must be held in an account-holding institution which is a third party, which is under supervision and which is unrelated to the party providing the collateral security.

Reuse of collateral security:

- h) **Realisation:** A sub-fund must at all times be able to realise any collateral security received without notice to or approval from the counterparty.
- i) Any collateral security which is not provided in cash cannot be sold, reinvested or pledged.
- j) Any collateral security received in the form of cash may only:
  - be placed on deposit in entities described in Article 50(f) of the UCITS Directive (credit institutions in the EU under the supervision of a supervisory authority or credit institutions in other countries subject to equivalent rules)
  - be invested in high-quality government bonds
  - be used with a view to reverse repo transactions.

## **12.5 Valuation of collateral security**

Any collateral security will be marked to market with haircuts as provided in Regulation 2016/2251 of 4 October 2016 supplementing Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories with regard to regulatory technical standards for risk-mitigation techniques for OTC derivative contracts not cleared by a central counterparty.

**APPENDIX 1: Trading costs/composition and maximum size of issue surcharge as a percentage**

<b>Sub-fund/Unit class</b>	<b>Commission and any other direct trading costs of purchasing instruments, approx.</b>	<b>Other market-derived costs of purchasing instruments, approx.</b>	<b>Total, maximum<sup>(1)</sup></b>
<b>AlmenBolig Korte Obligationer KL</b>			
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	0.00	0.08	0.08
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	0.00	0.08	0.08
<b>AlmenBolig Mellemlange Obligationer KL</b>			
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	0.00	0.08	0.08
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	0.00	0.08	0.08
<b>AlmenBolig Obligationer Varighed 2 KL</b>			
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	0.00	0.08	0.08
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Absolut KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Allokering - Akkumulerende KL</b>			
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	0.00	0.08	0.08
<b>Danske Obligationer Allokering KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Varighed 0 - 6 KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Varighed 3 KL</b>	0.00	0.08	0.08
<b>Euro Investment Grade Corp Bonds Restricted KL</b>			
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	0.00	0.25	0.25
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	0.00	0.25	0.25
<b>Flexinvest Aktier KL</b>	0.06	0.07	0.13
<b>Flexinvest Danske Obligationer KL</b>	0.00	0.08	0.08
<b>Flexinvest Fonde KL</b>	0.00	0.08	0.08
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.00	0.08	0.08
<b>Flexinvest Globale Obligationer KL</b>	0.00	0.46	0.46
<b>Flexinvest Korte Obligationer KL</b>	0.00	0.17	0.17
<b>Flexinvest Lange Obligationer KL</b>	0.00	0.10	0.10
<b>Global Equity Solution - Akkumulerende KL</b>			
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>	0.06	0.07	0.13
<i>Global Equity Solution, klasse NOK W</i>	0.06	0.07	0.13
<i>Global Equity Solution, klasse SEK W</i>	0.06	0.07	0.13
<b>Global Equity Solution 2 - Akkumulerende KL</b>			
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	0.00	0.00	0.00
<b>Global Equity Solution KL</b>	0.06	0.07	0.13
<b>Global Sustainable Future 3 KL</b>			
<i>Global Sustainable Future 3, klasse DKK d</i>	0.06	0.04	0.10
<i>Global Sustainable Future 3, klasse DKK W d</i>	0.06	0.04	0.10

<b>Sub-fund/Unit class</b>	<b>Commission and any other direct trading costs of purchasing instruments, approx.</b>	<b>Other market-derived costs of purchasing instruments, approx.</b>	<b>Total, maximum<sup>(1)</sup></b>
<b>Global Restricted KL</b>	0.06	0.07	0.13
<b>Global Sustainable Future Restricted – Accumulating KL</b>	0.06	0.04	0.10
<b>Kommuner 4 KL</b>	0.00	0.08	0.08
<b>Norske Aktier Restricted - Akkumulerende KL</b>			
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	0.04	0.06	0.10
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>			
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>	0.00	0.00	0.00
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>	0.00	0.00	0.00
<b>Tactical Asset Allocation Danmark - Akkumulerende KL</b>			
<i>Tactical Asset Allocation Danmark - Akkumulerende, klasse DKK W</i>	0.02	0.07	0.09
<b>Tactical Asset Allocation Norge – Accumulating KL</b>			
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	0.02	0.05	0.07
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>			
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	0.03	0.07	0.10
<b>Tactical Asset Allocation EURO – Accumulating KL</b>			
<i>Tactical Asset Allocation EURO, class EUR W</i>	0.02	0.05	0.07
<b>US High Yield Bonds - Akkumulerende KL</b>			
<i>US High Yield Bonds - Akkumulerende, klasse DKK W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, klass SEK W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, osuuslaji EUR W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, klasse NOK W h</i>	0.00	0.50	0.50
<b>US High Yield Bonds KL</b>	0.00	0.50	0.50
<b>USA Mid Cap - Akkumulerende KL</b>			
<i>USA Mid Cap, klasse DKK W</i>	0.07	0.09	0.16
<i>USA Mid Cap, osuuslaji EUR W</i>	0.07	0.09	0.16
<i>USA Mid Cap, klasse NOK W</i>	0.07	0.09	0.16
<i>USA Mid Cap, klass SEK W</i>	0.07	0.09	0.16
<b>USA Mid Cap KL</b>			
<i>USA Mid Cap, klasse DKK W d</i>	0.07	0.09	0.16

<sup>1)</sup> The maximum issue surcharge stated may be exceeded during periods of abnormal market conditions leading to an increase in "other market-derived costs of purchasing instruments". If this situation occurs, the fund will post the specific issue surcharge at [www.danskeinvest.dk](http://www.danskeinvest.dk) or [www.danskeinvest.com](http://www.danskeinvest.com) during the relevant period. For listed sub-funds or unit classes, changes will also be posted via NASDAQ Copenhagen A/S in a company announcement.

**APPENDIX 2: Trading costs/composition and maximum size of redemption discount as a percentage**

<b>Sub-fund/Unit class</b>	<b>Commission and any other direct trading costs of selling instruments, approx.</b>	<b>Other market-derived costs of selling instruments, approx.</b>	<b>Total, maximum<sup>(1)</sup></b>
<b>AlmenBolig Korte Obligationer KL</b>			
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	0.00	0.08	0.08
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	0.00	0.08	0.08
<b>AlmenBolig Mellemlange Obligationer KL</b>			
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	0.00	0.08	0.08
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	0.00	0.08	0.08
<b>AlmenBolig Obligationer Varighed 2 KL</b>			
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	0.00	0.08	0.08
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Absolut KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Allokering - Akkumulerende KL</b>			
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	0.00	0.08	0.08
<b>Danske Obligationer Allokering KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Varighed 0 - 6 KL</b>	0.00	0.08	0.08
<b>Danske Obligationer Varighed 3 KL</b>	0.00	0.08	0.08
<b>Euro Investment Grade Corp Bonds Restricted KL</b>			
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	0.00	0.25	0.25
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	0.00	0.25	0.25
<b>Flexinvest Aktier KL</b>	0.02	0.07	0.09
<b>Flexinvest Danske Obligationer KL</b>	0.00	0.08	0.08
<b>Flexinvest Fonde KL</b>	0.00	0.08	0.08
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.00	0.08	0.08
<b>Flexinvest Globale Obligationer KL</b>	0.00	0.44	0.44
<b>Flexinvest Korte Obligationer KL</b>	0.00	0.18	0.18
<b>Flexinvest Lange Obligationer KL</b>	0.00	0.10	0.10
<b>Global Equity Solution - Akkumulerende KL</b>			
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>	0.02	0.07	0.09
<i>Global Equity Solution, klasse NOK W</i>	0.02	0.07	0.09
<i>Global Equity Solution, klasse SEK W</i>	0.02	0.07	0.09
<b>Global Equity Solution 2 - Akkumulerende KL</b>			
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	0.00	0.00	0.00
<b>Global Equity Solution KL</b>	0.02	0.07	0.09
<b>Global Sustainable Future 3 KL</b>			
<i>Global Sustainable Future 3, klasse DKK d</i>	0.04	0.04	0.08
<i>Global Sustainable Future 3, klasse DKK W d</i>	0.04	0.04	0.08

<b>Sub-fund/Unit class</b>	<b>Commission and any other direct trading costs of selling instruments, approx.</b>	<b>Other market-derived costs of selling instruments, approx.</b>	<b>Total, maximum<sup>(1)</sup></b>
<b>Global Restricted KL</b>	0.02	0.07	0.09
<b>Global Sustainable Future Restricted – Accumulating KL</b>	0.04	0.04	0.08
<b>Kommuner 4 KL</b>	0.00	0.08	0.08
<b>Norske Aktier Restricted - Akkumulerende KL</b>			
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	0.04	0.06	0.10
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>			
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>	0.00	0.00	0.00
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>	0.00	0.00	0.00
<b>Tactical Asset Allocation Danmark - Akkumulerende KL</b>			
<i>Tactical Asset Allocation Danmark - Akkumulerende, klasse DKK W</i>	0.02	0.07	0.09
<b>Tactical Asset Allocation Norge – Accumulating KL</b>			
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	0.02	0.05	0.07
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>			
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	0.02	0.08	0.10
<b>Tactical Asset Allocation EURO – Accumulating KL</b>			
<i>Tactical Asset Allocation EURO, class EUR W</i>	0.02	0.05	0.07
<b>US High Yield Bonds - Akkumulerende KL</b>			
<i>US High Yield Bonds - Akkumulerende, klasse DKK W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, klass SEK W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, osuuslaji EUR W h</i>	0.00	0.50	0.50
<i>US High Yield Bonds, klasse NOK W h</i>	0.00	0.50	0.50
<b>US High Yield Bonds KL</b>	0.00	0.50	0.50
<b>USA Mid Cap - Akkumulerende KL</b>			
<i>USA Mid Cap, klasse DKK W</i>	0.07	0.09	0.16
<i>USA Mid Cap, osuuslaji EUR W</i>	0.07	0.09	0.16
<i>USA Mid Cap, klasse NOK W</i>	0.07	0.09	0.16
<i>USA Mid Cap, klass SEK W</i>	0.07	0.09	0.16
<b>USA Mid Cap KL</b>			
<i>USA Mid Cap, klasse DKK W d</i>	0.07	0.09	0.16

<sup>1)</sup> The maximum redemption discount stated may be exceeded during periods of abnormal market conditions leading to an increase in “other market-derived costs of selling instruments”. If this situation occurs, the fund will post the specific redemption discounts at [www.danskeinvest.dk](http://www.danskeinvest.dk) or [www.danskeinvest.com](http://www.danskeinvest.com) during the relevant period. For listed sub-funds or unit classes, changes will also be posted via NASDAQ Copenhagen A/S in a company announcement.

### APPENDIX 3: Administration fee and management fee

The fees are calculated based on average assets under management and are payable by the sub-fund.

Sub-fund/Unit class	Management fee to Danske Invest Management, p.a.	Management fee to Danske Invest Management, p.a.	Total, % p.a.
<b>AlmenBolig Korte Obligationer KL</b>			
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	0.08%	0.19%	0.27%
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	0.08%	0.12%	0.20%
<b>AlmenBolig Mellemlange Obligationer KL</b>			
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	0.08%	0.19%	0.27%
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	0.08%	0.12%	0.20%
<b>AlmenBolig Obligationer Varighed 2 KL</b>			
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	0.08%	0.12%	0.20%
<b>Danske Obligationer Absolut – Lav Risiko KL</b>	0.04%	0.11%	0.15%
<b>Danske Obligationer Absolut KL</b>	0.04%	0.11%	0.15%
<b>Danske Obligationer Allokering – Akkumulerende KL</b>			
<i>Danske Obligationer Allokering – Akkumulerende, klasse DKK W h</i>	0.12%	0.26%	0.38%
<b>Danske Obligationer Allokering KL</b>	0.12%	0.26%	0.38%
<b>Danske Obligationer Varighed 0 – 6 KL</b>	0.04%	0.11%	0.15%
<b>Danske Obligationer Varighed 3 KL</b>	0.04%	0.11%	0.15%
<b>Euro Investment Grade Corp Bonds Restricted KL</b>			
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	0.12%	0.59%	0.71%
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	0.12%	0.38%	0.50%
<b>Flexinvest Aktier KL</b>	0.15%	0.87%	1.02%
<b>Flexinvest Danske Obligationer KL</b>	0.10%	0.31%	0.41%
<b>Flexinvest Fonde KL</b>	0.10%	0.26%	0.36%
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.11%	0.17%	0.28%
<b>Flexinvest Globale Obligationer KL</b>	0.14%	0.63%	0.77%
<b>Flexinvest Korte Obligationer KL</b>	0.11%	0.30%	0.41%
<b>Flexinvest Lange Obligationer KL</b>	0.10%	0.29%	0.39%
<b>Global Equity Solution – Akkumulerende KL</b>			
<i>Global Equity Solution – Akkumulerende, klasse DKK W</i>	0.17%	0.49%	0.66%
<i>Global Equity Solution, klasse NOK W</i>	0.17%	0.49%	0.66%
<i>Global Equity Solution, klasse SEK W</i>	0.17%	0.49%	0.66%
<b>Global Equity Solution 2 – Akkumulerende KL</b>			
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	0.17%	0.79%	0.96%
<b>Global Equity Solution KL</b>	0.17%	0.49%	0.66%
<b>Global Sustainable Future 3 KL</b>			



<b>Sub-fund/Unit class</b>	<b>Management fee to Danske Invest Management, p.a.</b>	<b>Management fee to Danske Invest Management, p.a.</b>	<b>Total, % p.a.</b>
<i>Global Sustainable Future 3, klasse DKK d</i>	0.14%	1.32%	1.46%
<i>Global Sustainable Future 3, klasse DKK W d</i>	0.14%	0.85%	0.99%
<b>Global Restricted KL</b>	0.17%	0.49%	0.66%
<b>Global Sustainable Future Restricted – Accumulating KL</b>	0.14%	1.37%	1.51%
<b>Kommuner 4 KL</b>	0.12%	0.22%	0.34%
<b>Norske Aktier Restricted – Akkumulerende KL</b>			
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	0.18%	0.82%	1.00%
<b>PP Pension Aktieallokeringsfond – Accumulating KL</b>			
<i>PP Pension Aktieallokeringsfond – Accumulating Class A</i>	See description in section 10.8		
<i>PP Pension Aktieallokeringsfond – Accumulating Class I</i>	See description in section 10.8		
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>			
<i>Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W</i>	0.14%	0.36%	0.50%
<b>Tactical Asset Allocation Norge – Accumulating KL</b>			
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	0.14%	0.36%	0.50%
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>			
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	0.14%	0.36%	0.50%
<b>Tactical Asset Allocation EURO – Accumulating KL</b>			
<i>Tactical Asset Allocation EURO, class EUR W</i>	0.14%	0.36%	0.50%
<b>US High Yield Bonds – Akkumulerende KL</b>			
<i>US High Yield Bonds – Akkumulerende, klasse DKK W h</i>	0.12%	0.68%	0.80%
<i>US High Yield Bonds, klass SEK W h</i>	0.12%	0.68%	0.80%
<i>US High Yield Bonds, osuuslaji EUR W h</i>	0.12%	0.68%	0.80%
<i>US High Yield Bonds, klasse NOK W h</i>	0.12%	0.68%	0.80%
<b>US High Yield Bonds KL</b>	0.12%	0.68%	0.80%
<b>USA Mid Cap – Akkumulerende KL</b>			
<i>USA Mid Cap, klasse DKK W</i>	0.15%	0.72%	0.87%
<i>USA Mid Cap, klasse NOK W</i>	0.15%	0.72%	0.87%
<i>USA Mid Cap, klass SEK W</i>	0.15%	0.72%	0.87%
<i>USA Mid Cap, osuuslaji EUR W</i>	0.15%	0.72%	0.87%
<b>USA Mid Cap KL</b>			
<i>USA Mid Cap, klasse DKK W d</i>	0.15%	0.72%	0.87%

<sup>1)</sup> Plus any extraordinary international transaction costs relating to dividends.

#### APPENDIX 4: Administrative expenses over the last five years

Sub-fund/Unitclass	2018	2019	2020	2021	2022
<b>AlmenBolig Korte Obligationer KL</b>					
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	0.27	0.27	0.27	0.27	0.27
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	0.20	0.20	0.20	0.20	0.20
<b>AlmenBolig Mellemlange Obligationer KL</b>	-	-	-		
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	0.27	0.27	0.27	0.27	0.27
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	0.20	0.20	0.20	0.20	0.20
<b>AlmenBolig Obligationer Varighed 2 KL</b>	-	-	-		
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	0.20	0.20	0.20	0.20	0.20
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	0.15	0.15	0.15	0.15	0.15
<b>Danske Obligationer Absolut KL</b>	0.15	0.15	0.15	0.15	0.15
<b>Danske Obligationer Allokering – Akkumulerende KL</b>	-	-	-		
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	0.38	0.38	0.38	0.38	0.38
<b>Danske Obligationer Allokering KL</b>	0.38	0.38	0.38	0.38	0.38
<b>Danske Obligationer Varighed 0 - 6 KL</b>	0.15	0.15	0.15	0.15	0.15
<b>Danske Obligationer Varighed 3 KL</b>	0.15	0.15	0.15	0.15	0.15
<b>Euro Investment Grade Corp Bonds Restricted KL</b>	-	-	-		
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	0.84	0.84	0.84	0.76	0.76
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	0.57	0.57	0.57	0.55	0.55
<b>Flexinvest Aktier KL</b>	1.09	1.02	1.02	1.02	1.02
<b>Flexinvest Danske Obligationer KL</b>	0.51	0.45	0.41	0.41	0.41
<b>Flexinvest Fonde KL</b>	0.38	0.38	0.38	0.38	0.38
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.28	0.28	0.28	0.28	0.28
<b>Flexinvest Globale Obligationer KL</b>	0.79	0.79	0.79	0.79	0.79
<b>Flexinvest Korte Obligationer KL</b>	0.41	0.41	0.41	0.41	0.41
<b>Flexinvest Lange Obligationer KL</b>	0.41	0.41	0.41	0.41	0.41
<b>Global Equity Solution – Akkumulerende KL</b>	-	-	-		
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>	0.66	0.66	0.66	0.66	0.66
<i>Global Equity Solution, klasse NOK W</i>	0.49	0.49	0.66	0.65	0.66
<i>Global Equity Solution, klass SEK W</i>	0.66	0.66	0.66	0.66	0.66
<b>Global Equity Solution 2 – Akkumulerende KL</b>	-	-	-		
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	0.96	0.96	0.95	0.96	0.96
<b>Global Equity Solution KL</b>	0.66	0.66	0.66	0.66	0.66
<b>Global Sustainable Future 3 KL</b>	-	-	-		
<i>Global Sustainable Future 3, klasse DKK d</i>	1.54	1.54	1.49	1.49	1.49
<i>Global Sustainable Future 3, klasse DKK W d</i>	0.99	0.99	1.02	1.02	1.02
<b>Global Restricted KL</b>	0.66	0.66	0.66	0.66	0.66
<b>Global Sustainable Future Restricted – Accumulating KL</b>	1.55	1.55	1.55	1.55	1.55

Sub-fund/Unit class	2018	2019	2020	2021	2022
<b>Kommuner 4 KL</b>	0.34	0.34	0.34	0.34	0.34
<b>Norske Aktier Restricted – Akkumulerende KL</b>	-	-	-		
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	1.00	1.00	1.00	1.00	1.00
<b>PP Pension Aktieallokeringsfond – Accumulating KL</b>	-				
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>	0.69	0.70	0.69	0.67	0.62
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>	0.15	0.13	0.15	0.11	0.13
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>					
<i>Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W</i>	-	-	0.50	0.50	0.50
<b>Tactical Asset Allocation Norge – Accumulating KL</b>					
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	-	-	0.50	0.50	0.50
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>					
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	-	-	0.50	0.50	0.50
<b>Tactical Asset Allocation EURO – Accumulating KL</b>					
<i>Tactical Asset Allocation EURO, class EUR W</i>	-	-	0.50	0.50	0.50
<b>US High Yield Bonds - Akkumulerende KL</b>	-				
<i>US High Yield Bonds - Akkumulerende, klasse DKK W h</i>	0.85	0.85	0.85	0.85	0.85
<i>US High Yield Bonds, klass SEK W h</i>	0.85	-	-	-	-
<i>US High Yield Bonds, osuuslaji EUR W h</i>	0.85	0.85	-	-	-
<i>US High Yield Bonds, klasse NOK W h</i>	-	-	-	-	-
<b>US High Yield Bonds KL</b>	0.85	0.85	0.85	0.85	0.85
<b>USA Mid Cap – Akkumulerende KL</b>					
<i>USA Mid Cap, klasse DKK W</i>	-	-	1.02	1.00	0.89
<i>USA Mid Cap, klasse NOK W</i>	-	-	1.02	0.99	0.89
<i>USA Mid Cap, klass SEK W</i>	-	-	1.02	1.00	0.89
<i>USA Mid Cap, osuuslaji EUR W</i>	-	-	1.02	1.00	0.89
<b>USA Mid Cap KL</b>					
<i>USA Mid Cap, klasse DKK W d</i>	-	-	1.02	1.01	0.89

<sup>(1)</sup> The sub-fund/unit class was established during the year. The cost covers a period of less than 12 months.

## APPENDIX 5: Portfolio management fee

The fees are calculated based on total assets and are payable by Danske Invest Management A/S from the management fee stated in appendix 3.

Sub-fund/Unit class	Fee relating to portfolio management services to Danske Bank % p.a.
<b>AlmenBolig Korte Obligationer KL</b>	
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	0.13%
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	0.13%
<b>AlmenBolig Mellemlange Obligationer KL</b>	
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	0.13%
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	0.13%
<b>AlmenBolig Obligationer Varighed 2 KL</b>	
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	0.13%
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	0.12%
<b>Danske Obligationer Absolut KL</b>	0.12%
<b>Danske Obligationer Allokering - Akkumulerende KL</b>	
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	0.26%
<b>Danske Obligationer Allokering KL</b>	0.26%
<b>Danske Obligationer Varighed 0 – 6 KL</b>	0.12%
<b>Danske Obligationer Varighed 3 KL</b>	0.12%
<b>Euro Investment Grade Corp Bonds Restricted KL</b>	
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	0.38%
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	0.38%
<b>Flexinvest Aktier KL</b>	0.87%
<b>Flexinvest Danske Obligationer KL</b>	0.31%
<b>Flexinvest Fonde KL</b>	0.26%
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.17%
<b>Flexinvest Globale Obligationer KL</b>	0.64%
<b>Flexinvest Korte Obligationer KL</b>	0.30%
<b>Flexinvest Lange Obligationer KL</b>	0.29%
<b>Global Equity Solution - Akkumulerende KL</b>	
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>	0.49%
<i>Global Equity Solution, klasse NOK W</i>	0.49%
<i>Global Equity Solution, klass SEK W</i>	0.49%
<b>Global Equity Solution 2 - Akkumulerende KL</b>	
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	0.79%
<b>Global Equity Solution KL</b>	0.49%
<b>Global Sustainable Future 3 KL</b>	
<i>Global Sustainable Future 3, klasse DKK d</i>	0.85%
<i>Global Sustainable Future 3, klasse DKK W d</i>	0.85%
<b>Global Restricted KL</b>	0.49%

<b>Sub-fund/Unit class</b>	<b>Fee relating to portfolio management services to Danske Bank % p.a.</b>
<b>Global Sustainable Future Restricted – Accumulating KL</b>	0.85%
<b>Kommuner 4 KL</b>	0.13%
<b>Norske Aktier Restricted - Akkumulerende KL</b>	
<i>Norske Aksjer Institusjon Restricted, klasse NOK I<sup>2)</sup></i>	0.00%
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>	
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>	0.12% <sup>1)</sup>
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>	0.12% <sup>1)</sup>
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>	
<i>Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W</i>	0.36%
<b>Tactical Asset Allocation Norge – Accumulating KL</b>	
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	0.36%
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>	
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	0.36%
<b>Tactical Asset Allocation EURO – Accumulating KL</b>	
<i>Tactical Asset Allocation EURO, class EUR W</i>	0.36%
<b>US High Yield Bonds – Akkumulerende KL</b>	
<i>US High Yield Bonds – Akkumulerende, klasse DKK W h</i>	0.67%
<i>US High Yield Bonds, klass SEK W h</i>	0.67%
<i>US High Yield Bonds, osuuslaji EUR W h</i>	0.67%
<i>US High Yield Bonds, klasse NOK W h</i>	0.67%
<b>US High Yield Bonds KL</b>	0.67%
<b>USA Mid Cap – Akkumulerende KL</b>	
<i>USA Mid Cap, klasse DKK W</i>	0.715%
<i>USA Mid Cap, klasse NOK W</i>	0.715%
<i>USA Mid Cap, klass SEK W</i>	0.715%
<i>USA Mid Cap, osuuslaji EUR W</i>	0.715%
<b>USA Mid Cap KL</b>	
<i>USA Mid Cap, klasse DKK W d</i>	0.715%

) The fee for the portfolio advisor Danske Bank, Asset Management is set as a residual, so that total costs for the unit class excluding any fees for sales will be 0.12% p.a. See section 10.9 for more information.

2) The fee to Danske Invest Asset Management AS is 0.75%

## APPENDIX 6: ISIN, SE No. and FT No.

Sub-fund/Unit class	ISIN	SE no.	FT no.	Lei code
<b>AlmenBolig Korte Obligationer KL</b>		37 55 55 09	11052-80	5493006J7VQM81VGNB82
<i>AlmenBolig Korte Obligationer, klasse DKK d</i>	DK0060730505	37 55 55 25		
<i>AlmenBolig Korte Obligationer, klasse DKK W d</i>	DK0060791721	35 45 45 27		
<b>AlmenBolig Mellemlange Obligationer KL</b>		33 47 88 44	11052-61	549300RJ08Y4NW6CUH70
<i>AlmenBolig Mellemlange Obligationer, klasse DKK d</i>	DK0016026081	35 45 44 38		
<i>AlmenBolig Mellemlange Obligationer, klasse DKK W d</i>	DK0060791218	35 45 44 46		
<b>AlmenBolig Obligationer Varighed 2 KL</b>		37 55 55 41	11052-81	5493004GMKB6CBGB3M20
<i>AlmenBolig Obligationer Varighed 2, klasse DKK W d</i>	DK0060730778	37 55 55 92		
<b>Danske Obligationer Absolut - Lav Risiko KL</b>	DK0060158590	34 18 47 12	11,052-69	549300GGRKCLKIMDL6012
<b>Danske Obligationer Absolut KL</b>	DK0060158673	34 18 47 04	11,052-70	549300VPYDZC8XUXP006
<b>Danske Obligationer Allokering - Akkumulerende KL</b>		33 49 05 85	11052-64	549300FPMT8PRKHI9023
<i>Danske Obligationer Allokering - Akkumulerende, klasse DKK W h</i>	DK0060509727	33 49 03 48		
<b>Danske Obligationer Allokering KL</b>	DK0060476539	33 48 24 34	11052-62	549300XPY6EBEGJ2TD57
<b>Danske Obligationer Varighed 0 – 6 KL</b>	DK0060700862	34 19 57 30	11052-78	5493005ECV5GCDQD4B58
<b>Danske Obligationer Varighed 3 KL</b>	DK0060700946	34 19 57 49	11052-79	549300DM0XZEQ08E1G46
<b>Euro Investment Grade Corp Bonds Restricted KL</b>		28 37 43 72	11052-33	549300WRK5GF3E3K0X89
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK d</i>	DK0016303936	35 45 44 70		
<i>Euro Investment Grade Corporate Bonds Restricted, klasse DKK W d</i>	DK0060791564	35 45 44 89		
<b>Flexinvest Aktier KL</b>	DK0060051605	29 38 57 69	11052-39	549300NN423Y1Q0DC420
<b>Flexinvest Danske Obligationer KL</b>	DK0060050987	29 38 56 53	11052-36	549300KVXG361GT VQI08
<b>Flexinvest Fonde KL</b>	DK0060178002	30 99 92 07	11052-50	549300M7YOG4YRURXC03
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	DK0060637569	34 19 06 74	11052-73	549300ROFGPHKIW28R59
<b>Flexinvest Globale Obligationer KL</b>	DK0060051449	29 38 57 34	11052-38	549300KFROP6GNTIDP53
<b>Flexinvest Korte Obligationer KL</b>	DK0060051282	29 38 56 96	11052-37	549300B VORCK9PRILY14
<b>Flexinvest Lange Obligationer KL</b>	DK0060178192	30 99 91 85	11052-51	5493004XNVVDH0SE7LO28
<b>Global Equity Solution - Akkumulerende KL</b>		33 49 05 93	11052-65	549300YS7NXLBDIFCG70
<i>Global Equity Solution - Akkumulerende, klasse DKK W</i>	DK0060507432	33 49 03 56		
<i>Global Equity Solution, klasse NOK W</i>	DK0060507515	33 49 03 72		
<i>Global Equity Solution, klass SEK W</i>	DK0060507788	33 49 03 64		
<b>Global Equity Solution 2 - Akkumulerende KL</b>		34 17 79 37	11052-68	549300D4TLU26437IC73

<b>Sub-fund/Unit class</b>	<b>ISIN</b>	<b>SE no.</b>	<b>FT no.</b>	<b>Lei code</b>
<i>Global Equity Solution FIN, osuuslaji EUR W</i>	DK0060518397	34 17 79 45		
<b>Global Equity Solution KL</b>	DK0060209682	31 02 70 39	11052-54	549300FPEG6ZTM604R89
<b>Global Sustainable Future 3KL</b>		32 53 65 49	11,052-10	5493005PB6TINV07ESB11
<i>Global Sustainable Future 3, klasse DKK d</i>	DK0060244408	35 45 44 97		
<i>Global Sustainable Future 3, klasse DKK W d</i>	DK0060791648	35 45 45 00		
<b>Global Restricted KL</b>	DK0060229284	31 03 79 05	11052-57	549300IH05JD21R72186
<b>Global Sustainable Future Restricted – Accumulating KL</b>	DK0060283067	32 53 58 79	11052-58	5493000BVQGB26X5DJ50
<b>Kommuner 4 KL</b>	DK0016205685	27 90 35 84	11052-27	549300HLJG3LNXU2P029
<b>Norske Aktier Restricted - Akkumulerende KL</b>		34 19 06 82	11,052-72	5493001X0JWDCEFCXC04
<i>Norske Aksjer Institusjon Restricted, klasse NOK I</i>	DK0060637643	34 19 06 90		
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>		33 48 36 43	11052-63	549300NT6ZOZZW1JNM48
<i>PP Pension Aktieallokeringsfond - Accumulating Class A</i>	DK0060476455	33 48 35 46		
<i>PP Pension Aktieallokeringsfond - Accumulating Class I</i>	DK0060476372	33 48 35 11		
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>		41 51 34 89	11052-084	549300E5HMCDDENX5A11
<i>Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W</i>	DK0061287349	41 51 35 27		
<b>Tactical Asset Allocation Norge – Accumulating KL</b>		41 51 35 35	11052-085	5493005SVF6XQHFXR297
<i>Tactical Asset Allocation Norge, klasse NOK W</i>	DK0061287422	41 51 35 43		
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>		41 51 35 51	11052-086	5493002TXHWMX0PTTR24
<i>Tactical Asset Allocation Sverige, klass SEK W</i>	DK0061287505	41 51 35 86		
<b>Tactical Asset Allocation EURO – Accumulating KL</b>		41 51 36 08	11052-087	549300FBBVKGY3G6OW62
<i>Tactical Asset Allocation EURO, class EUR W</i>	DK0061287695	41 51 36 16		
<b>US High Yield Bonds - Akkumulerende KL</b>		33 49 05 42	11052-67	549300SM4Q2KEDK6U118
<i>US High Yield Bonds - Akkumulerende, klasse DKK W h</i>	DK0060507192	33 49 05 50		
<i>US High Yield Bonds, klass SEK W h</i>	DK0062263109	33 49 05 77		
<i>US High Yield Bonds, osuuslaji EUR W h</i>	DK0062263299	33 49 05 69		
<i>US High Yield Bonds, klasse NOK W h</i>	DK0062262721	43 51 35 08		
<b>US High Yield Bonds KL</b>	DK0060178275	33 48 81 49	11052-66	549300DBHLX9WI4RUP07
<b>USA Mid Cap – Akkumulerende KL</b>		40 63 49 16	11052-083	549300Y7D4UBEWX7ZE66
<i>USA Mid Cap, klasse DKK W</i>	DK0061145398	35 46 23 84		
<i>USA Mid Cap, klasse NOK W</i>	DK0061145471	35 46 23 92		
<i>USA Mid Cap, klass SEK W</i>	DK0061149895	35 46 24 06		
<i>USA Mid Cap, osuuslaji EUR W</i>	DK0061149978	35 46 24 22		
<b>USA Mid Cap KL</b>		40 63 49 59	11052-082	549300E8GGQXKBVPNB35

Sub-fund/Unit class	ISIN	SE no.	FT no.	Lei code
USA Mid Cap, klasse DKK W d	DK0061145208	35 46 23 76		

## APPENDIX 7: Distribution costs

Name of sub-fund/unit class	Distribution costs
<b>AlmenBolig Korte Obligationer KL</b>	
AlmenBolig Korte Obligationer, Klasse DKK d	0.07%
AlmenBolig Korte Obligationer, Klasse DKK W d	0.00%
<b>AlmenBolig Mellemlange Obligationer KL</b>	
AlmenBolig Mellemlange Obligationer, klasse DKK d	0.07%
AlmenBolig Mellemlange Obligationer, klasse DKK W d	0.00%
<b>AlmenBolig Obligationer Varighed 2 KL</b>	
AlmenBolig Obligationer Varighed 2, Klasse DKK W d	0.00%
Danske Obligationer Absolut - Lav Risiko KL	0.00%
<b>Danske Obligationer Absolut KL</b>	0.00%
<b>Danske Obligationer Allokering - Akkumulerende KL</b>	
Danske Obligationer Allokering - Akkumulerende, klasse DKK W h	0.00%
Danske Obligationer Allokering KL	0.00%
Danske Obligationer Varighed 0 - 6 KL	0.00%
Danske Obligationer Varighed 3 KL	0.00%
<b>Euro Investment Grade Corporate Bonds Restricted KL</b>	
Euro Investment Grade Corporate Bonds Restricted, klasse DKK d	0.21%
Euro Investment Grade Corporate Bonds Restricted, Klasse DKK W d	0.00%
<b>Flexinvest Aktier KL</b>	0.00%
<b>Flexinvest Danske Obligationer KL</b>	0.00%
<b>Flexinvest Fonde KL</b>	0.00%
<b>Flexinvest Forvaltning Korte Obligationer KL</b>	0.00%
<b>Flexinvest Korte Obligationer KL</b>	0.00%
<b>Flexinvest Lange Obligationer KL</b>	0.00%
<b>Flexinvest Globale Obligationer KL</b>	0.00%
<b>Global Equity Solution - Akkumulerende KL</b>	
Global Equity Solution - Akkumulerende, klasse DKK W	0.00%
Global Equity Solution, klass SEK W	0.00%
Global Equity Solution, klasse NOK W	0.00%
<b>Global Equity Solution 2 - Akkumulerende KL</b>	
Global Equity Solution FIN, osuuslaji EUR W	0.00%
<b>Global Equity Solution KL</b>	0.00%
<b>Global Sustainable Future 3KL</b>	
Global Sustainable Future 3, klasse DKK d	0.47%
Global Sustainable Future 3, klasse DKK W d	0.00%
<b>Global Restricted KL</b>	0.00%
<b>Global Sustainable Future Restricted – Accumulating KL</b>	0.52%



<b>Name of sub-fund/unit class</b>	<b>Distribution costs</b>
<b>Kommuner 4 KL</b>	0.09%
<b>Norske Aktier Restricted – Akkumulerende KL</b>	
Norske Aksjer Institusjon Restricted, klasse NOK I	0.07%
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>	
PP Pension Aktieallokeringsfond - Accumulating Class A	See section 10.9.
PP Pension Aktieallok.fond - Accumulating Class I	See section 10.9.
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>	
Tactical Asset Allocation Danmark – Akkumulerende, klasse DKK W	0.00%
<b>Tactical Asset Allocation Norge – Accumulating KL</b>	
Tactical Asset Allocation Norge, klasse NOK W	0.00%
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>	
Tactical Asset Allocation Sverige, klass SEK W	0.00%
<b>Tactical Asset Allocation EURO – Accumulating KL</b>	
Tactical Asset Allocation EURO, class EUR W	0.00%
<b>US High Yield Bonds KL</b>	0.00%
<b>US High Yield Bonds - Akkumulerende KL</b>	
US High Yield Bonds - Akkumulerende, klasse DKK W	0.00%
US High Yield Bonds, klass SEK W h	0.00%
US High Yield Bonds, osuslaji EUR W h	0.00%
US High Yield Bonds, klasse NOK W	0.00%
<b>USA Mid Cap – Akkumulerende KL</b>	
USA Mid Cap, klasse DKK W	0.00%
USA Mid Cap, klasse NOK W	0.00%
USA Mid Cap, klass SEK W	0.00%
USA Mid Cap, osuslaji EUR W	0.00%
<b>USA Mid Cap KL</b>	
USA Mid Cap, klasse DKK W d	0.00%

## **APPENDIX 8: Approved exchanges and markets**

If stated in the sub-fund description in article 4 of the articles of association, a sub-fund may, see section 147(1)(iv) of the Danish Investments Associations, etc. Act, invest 35 per cent or more of its assets under management, within its investment area, in securities or money market instruments issued or guaranteed by:

- (a) a country; or
- (b) an international quasi-public institution in which one or more member states participate, and as approved by the Danish Financial Supervisory Authority.

The institutions currently comprised are listed below:

- African Development Bank
- Asian Development Bank
- Council of European Resettlement Fund for National Refugees and Overpopulation in Europe
- Euratom (European Atomic Energy Community)
- Eurofima (European Company for the Financing of Railroad Rolling Stock Switzerland)
- European Bank for Reconstruction and Development
- European Coal and Steel Community
- European Financial Stability Facility
- European Investment Bank
- International Finance Corporation
- Nordic Investment Bank
- World Bank (International Bank for Reconstruction and Development)
- Inter-American Development Bank

List of exchanges and other regulated markets which, in accordance with regulations issued by the Danish Financial Supervisory Authority, have been assessed and approved by the Board of Directors for investment by the relevant sub-funds (see article 4 of the articles of association):

- Nordic Alternative Bond Market (Nordic ABM)
- Members of the World Federation of Exchanges (WFE)
- The US OTC fixed income market
- China Interbank Bond Market (CIBM)

## APPENDIX 9: Sub-fund categories for sustainability-related disclosures

### Article 8: Sub-funds promoting environmental or social characteristics

The sub-fund complies with the responsible investment policy and also promotes environmental or social characteristics, as well good governance practices, which are incorporated through screening, restrictions, investment research and investments decisions as well as active ownership. See section 4 for additional information.

<b>Sub-funds under article 8</b>
<b>AlmenBolig Korte Obligationer KL</b>
<b>AlmenBolig Mellemlange Obligationer KL</b>
<b>AlmenBolig Obligationer Varighed 2 KL</b>
<b>Danske Obligationer Absolut - Lav Risiko KL</b>
<b>Danske Obligationer Absolut KL</b>
<b>Danske Obligationer Allokering - Akkumulerende KL</b>
<b>Danske Obligationer Allokering KL</b>
<b>Danske Obligationer Varighed 0 - 6 KL</b>
<b>Danske Obligationer Varighed 3 KL</b>
<b>Euro Investment Grade Corporate Bonds Restricted KL</b>
<b>Flexinvest Aktier KL</b>
<b>Flexinvest Danske Obligationer KL</b>
<b>Flexinvest Fonde KL</b>
<b>Flexinvest Forvaltning Korte Obligationer KL</b>
<b>Flexinvest Globale Obligationer KL</b>
<b>Flexinvest Korte Obligationer KL</b>
<b>Flexinvest Lange Obligationer KL</b>
<b>Global Equity Solution - Akkumulerende KL</b>
<b>Global Equity Solution 2 - Akkumulerende KL</b>
<b>Global Equity Solution KL</b>
<b>Global Restricted KL</b>
<b>Kommuner 4 KL</b>
<b>Norske Aktier Restricted – Akkumulerende KL</b>
<b>PP Pension Aktieallokeringsfond - Accumulating KL</b>
<b>Tactical Asset Allocation Danmark – Akkumulerende KL</b>
<b>Tactical Asset Allocation Norge – Accumulating KL</b>
<b>Tactical Asset Allocation Sverige – Accumulating KL</b>
<b>Tactical Asset Allocation EURO – Accumulating KL</b>
<b>US High Yield Bonds - Akkumulerende KL</b>
<b>US High Yield Bonds KL</b>
<b>USA Mid Cap – Akkumulerende KL</b>
<b>USA Mid Cap KL</b>

**Article 9: Sub-funds with a sustainable investment objective**

The sub-fund pursues a sustainable investment objective. The sub-fund also complies with the responsible investment policy and promotes environmental and/or social characteristics. See section 4 for additional information and appendix 10

<b>Sub-funds under article 9</b>
<b>Global Sustainable Future 3 KL</b>
<b>Global Sustainable Future Restricted – Accumulating KL</b>

## APPENDIX 10 - SFDR

### Table of Content

AlmenBolig Korte Obligationer KL	118
AlmenBolig Mellemlange Obligationer KL	125
AlmenBolig Obligationer Varighed 2 KL	132
Danske Obligationer Absolut - Lav Risiko KL	139
Danske Obligationer Absolut KL	146
Danske Obligationer Allokering - Akkumulerende KL	153
Danske Obligationer Allokering KL	160
Danske Obligationer Varighed 0 - 6 KL	167
Danske Obligationer Varighed 3 KL	174
Euro Investment Grade Corporate Bonds Restricted KL	181
Flexinvest Aktier KL	191
Flexinvest Danske Obligationer KL	201
Flexinvest Fonde KL	208
Flexinvest Forvaltning Korte Obligationer KL	215
Flexinvest Globale Obligationer KL	222
Flexinvest Korte Obligationer KL	229
Flexinvest Lange Obligationer KL	236
Global Equity Solution - Akkumulerende KL	243
Global Equity Solution 2 - Akkumulerende KL	253
Global Equity Solution KL	263
Global Restricted KL	273
Global Sustainable Future 3 KL	283
Global Sustainable Future Restricted - Accumulating KL	292
Kommuner 4 KL	301
Norske Aktier Restricted - Akkumulerende KL	308
PP Pension Aktieallokeringsfond - Accumulating KL	318
Tactical Asset Allocation Danmark - Akkumulerende KL	325
Tactical Asset Allocation EURO - Accumulating KL	332
Tactical Asset Allocation Norge - Accumulating KL	339
Tactical Asset Allocation Sverige - Accumulating KL	346
US High Yield Bonds - Akkumulerende KL	353
US High Yield Bonds KL	360
USA Mid Cap - Akkumulerende KL	367
USA Mid Cap KL	374

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes    No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

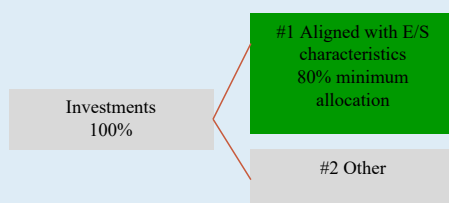
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

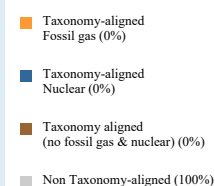
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

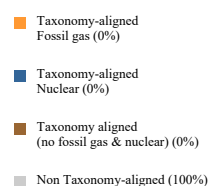
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 94% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %  
 in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments  
 with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  
 with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?



Asset allocation describes the share of investments in specific assets.

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

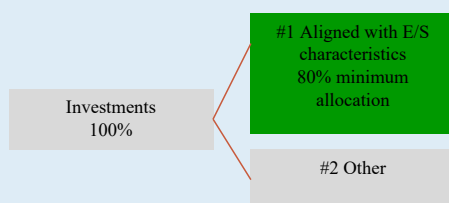
With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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



Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

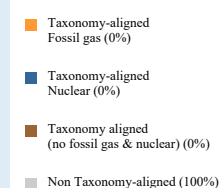
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

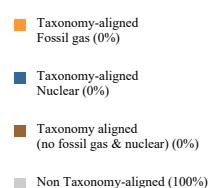
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 90% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

It will make a minimum of sustainable investments with an environmental objective: %  
 in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of sustainable investments with a social objective \_\_\_%

It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments  
 with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  
 with a social objective

It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

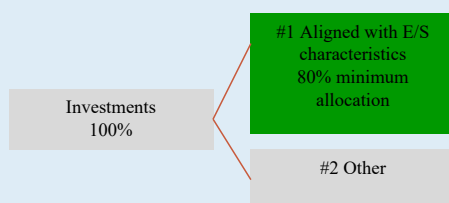
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.



## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

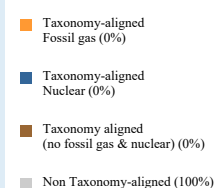
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

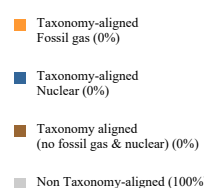
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 88% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

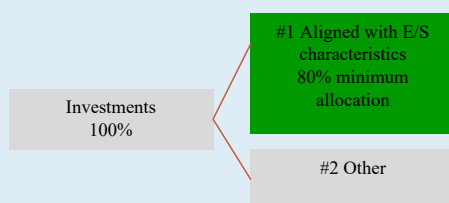
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

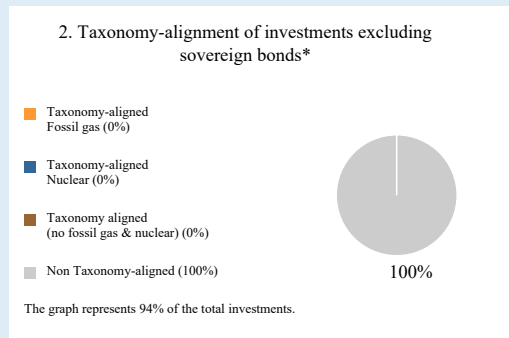
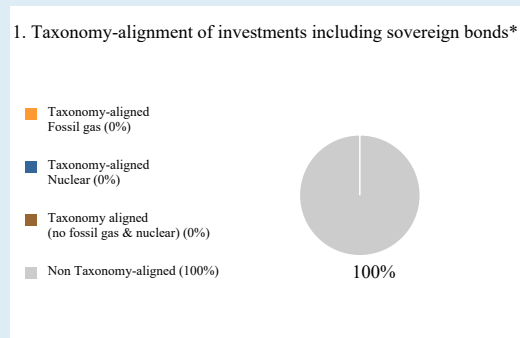
\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.





## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

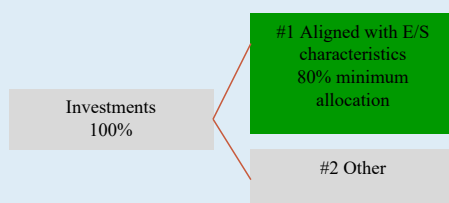
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

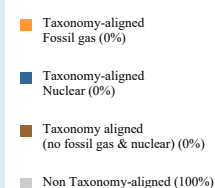
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

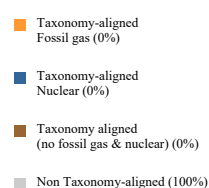
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 94% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)



## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue) and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

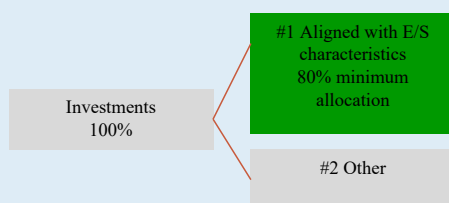
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

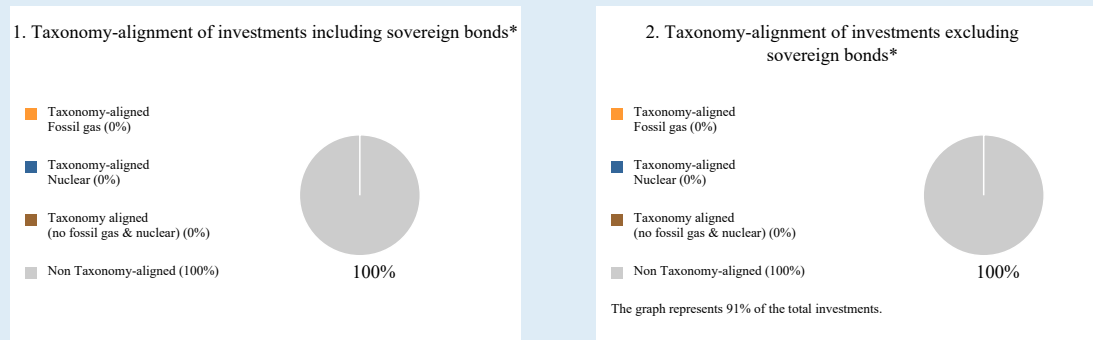
\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics



The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

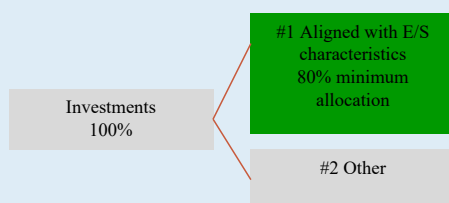
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

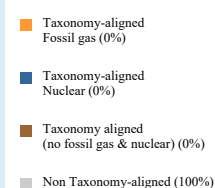
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

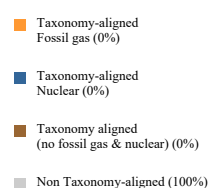
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 91% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where



pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

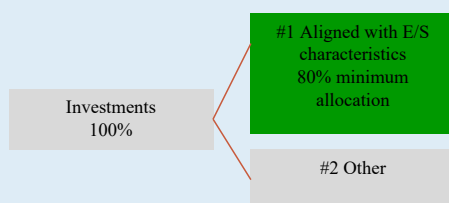
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

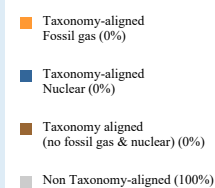
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

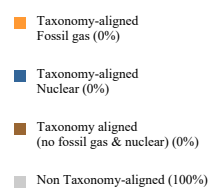
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 85% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where

pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

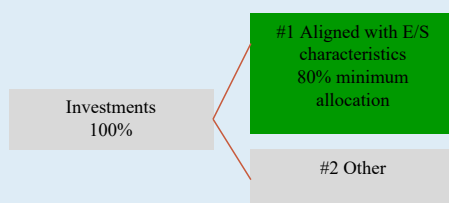
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

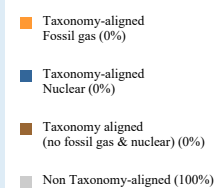
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

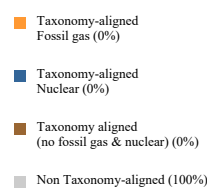
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 93% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 25% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.

- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The fund's weighted ESG score based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

## **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the “SDGs”). The fund’s investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund’s sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer’s activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www. danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainable investments may also be sustainability-labelled bonds.

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www. danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.





## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, inclusion criteria, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

The inclusion criteria for sound sustainability practices and environmental stewardship applied by the fund prioritise a weighting of issuers deemed to perform well on social, environmental as well as governance related parameters. This also involves considerations for indicators of significant adverse impacts on sustainability factors.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's inclusions, exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 25% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

“Sound sustainability practices”: The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

“Sound environmental stewardship”: The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

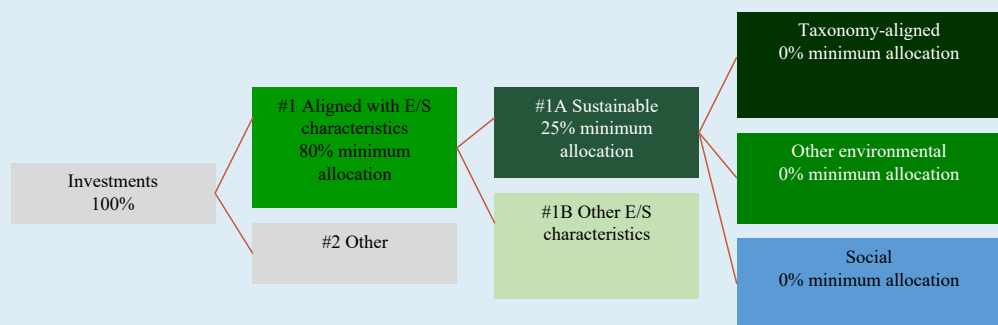
The fund has a minimum allocation to sustainable investments of 25% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
  - In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

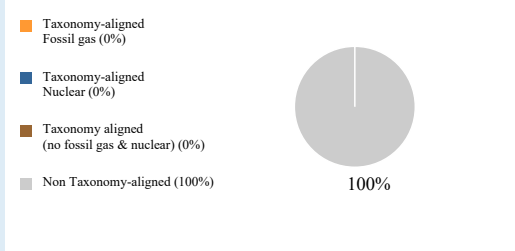
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

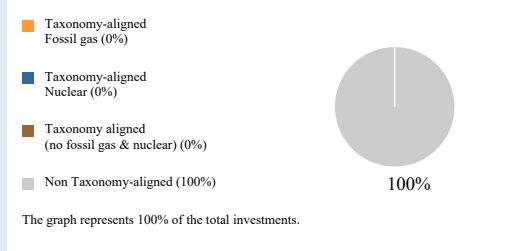
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund’s annual report.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for inclusions, exclusions, or covered by the fund’s active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.

- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue) and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the "SDGs"). The fund's investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts;

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund's sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the "SDG Model"). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer's activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

## How have the indicators for adverse impacts on sustainability factors been taken into account?

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of “no significant harm” is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund’s general exclusions, thresholds for the fund’s sustainable investments, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

"Sustainable investments": The fund invests a minimum of 5% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the "do no significant harm" principle as well as principles of good governance (as discussed above and in "Good governance" below).

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

The fund has a minimum allocation to sustainable investments of 5% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

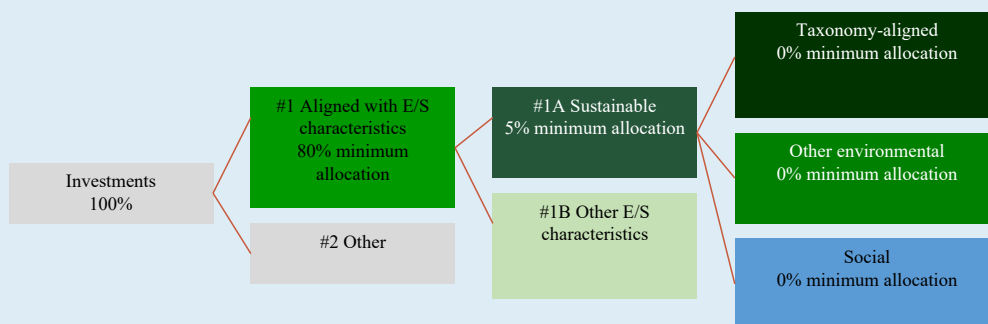
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

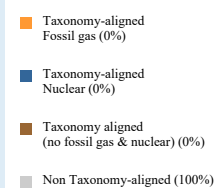
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

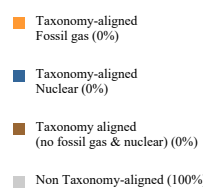
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



## What is the minimum share of socially sustainable investments?

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund's annual report.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)



## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

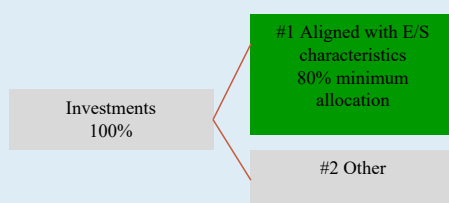
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

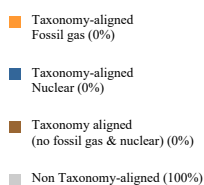
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

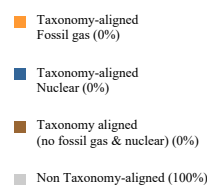
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 76% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes    No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics



The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

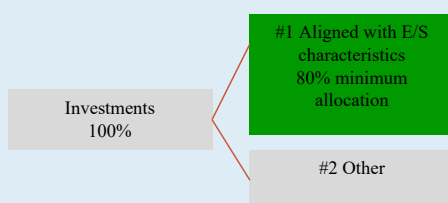
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*

- Taxonomy-aligned Fossil gas (0%)
- Taxonomy-aligned Nuclear (0%)
- Taxonomy aligned (no fossil gas & nuclear) (0%)
- Non Taxonomy-aligned (100%)



2. Taxonomy-alignment of investments excluding sovereign bonds\*

- Taxonomy-aligned Fossil gas (0%)
- Taxonomy-aligned Nuclear (0%)
- Taxonomy aligned (no fossil gas & nuclear) (0%)
- Non Taxonomy-aligned (100%)



The graph represents 89% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest



Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

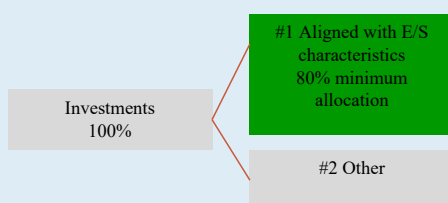
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

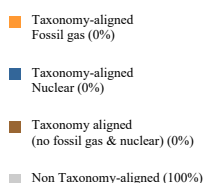
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

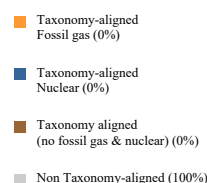
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 84% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

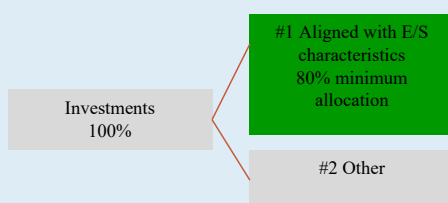
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

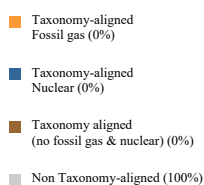
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

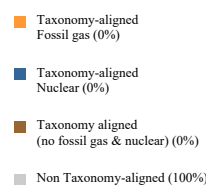
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 72% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

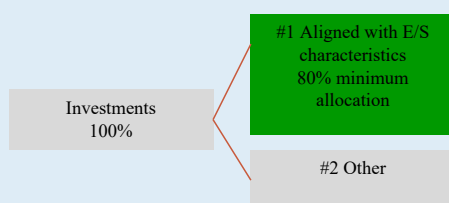
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.





## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
  - In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

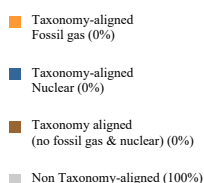
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

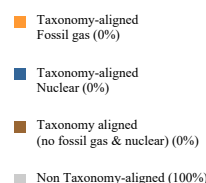
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 85% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

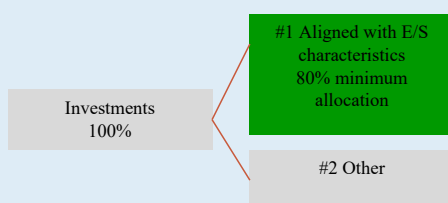
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
  - In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*

- Taxonomy-aligned Fossil gas (0%)
- Taxonomy-aligned Nuclear (0%)
- Taxonomy aligned (no fossil gas & nuclear) (0%)
- Non Taxonomy-aligned (100%)



2. Taxonomy-alignment of investments excluding sovereign bonds\*

- Taxonomy-aligned Fossil gas (0%)
- Taxonomy-aligned Nuclear (0%)
- Taxonomy aligned (no fossil gas & nuclear) (0%)
- Non Taxonomy-aligned (100%)



The graph represents 66% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.

- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The fund's weighted ESG score based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

## **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the “SDGs”). The fund’s investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund’s sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer’s activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model.

In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, inclusion criteria, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

The inclusion criteria for sound sustainability practices and environmental stewardship applied by the fund prioritise a weighting of issuers deemed to perform well on social, environmental as well as governance related parameters. This also involves considerations for indicators of significant adverse impacts on sustainability factors.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's inclusions, exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 5% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

“Sound sustainability practices”: The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

“Sound environmental stewardship”: The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.





## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

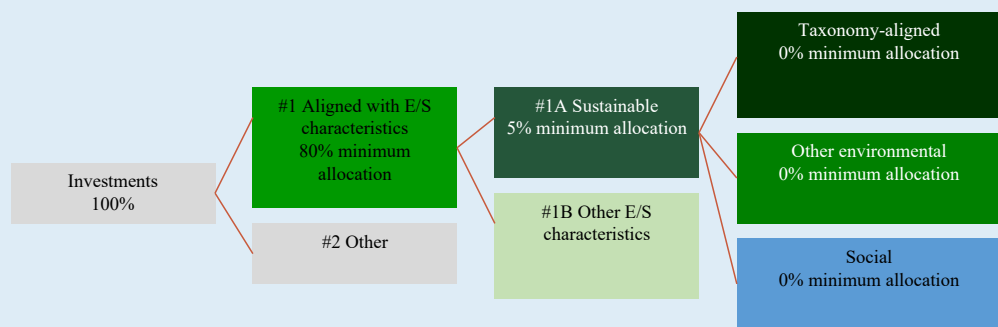
The fund has a minimum allocation to sustainable investments of 5% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

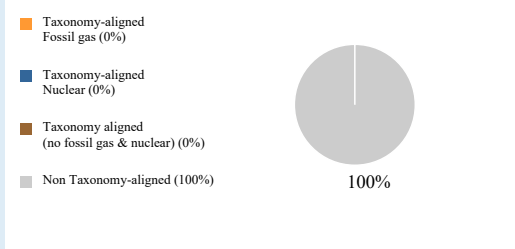
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

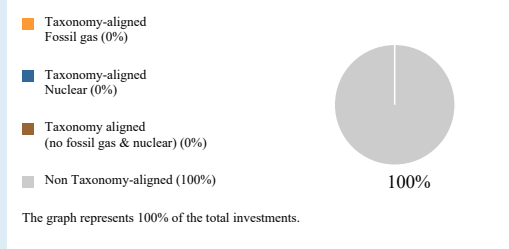
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund’s annual report.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for inclusions, exclusions, or covered by the fund’s active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.

- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The fund's weighted ESG score based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

## **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the “SDGs”). The fund’s investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund’s sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer’s activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.





## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, inclusion criteria, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

The inclusion criteria for sound sustainability practices and environmental stewardship applied by the fund prioritise a weighting of issuers deemed to perform well on social, environmental as well as governance related parameters. This also involves considerations for indicators of significant adverse impacts on sustainability factors.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's inclusions, exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 5% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

“Sound sustainability practices”: The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

“Sound environmental stewardship”: The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

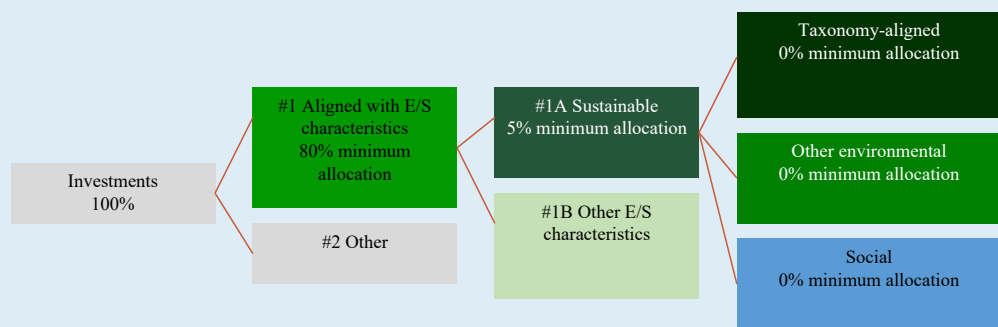
The fund has a minimum allocation to sustainable investments of 5% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
  - In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

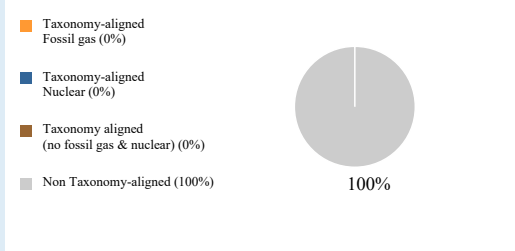
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

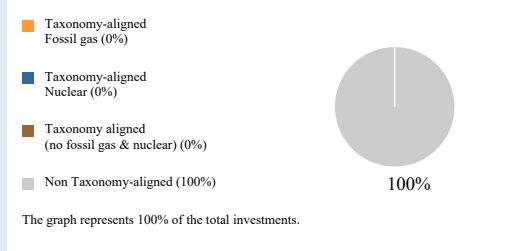
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

"The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy" are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### **What is the minimum share of socially sustainable investments?**

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund's annual report.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for inclusions, exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.

- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The fund's weighted ESG score based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the “SDGs”). The fund’s investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund’s sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer’s activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model.

In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, inclusion criteria, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

The inclusion criteria for sound sustainability practices and environmental stewardship applied by the fund prioritise a weighting of issuers deemed to perform well on social, environmental as well as governance related parameters. This also involves considerations for indicators of significant adverse impacts on sustainability factors.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's inclusions, exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 5% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

“Sound sustainability practices”: The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

“Sound environmental stewardship”: The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

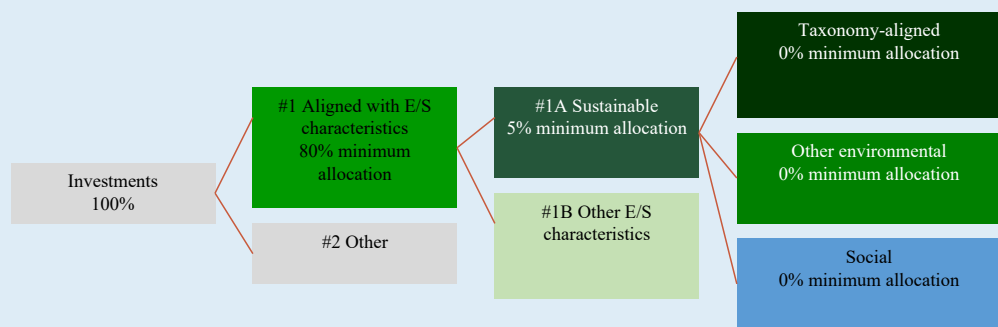
The fund has a minimum allocation to sustainable investments of 5% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

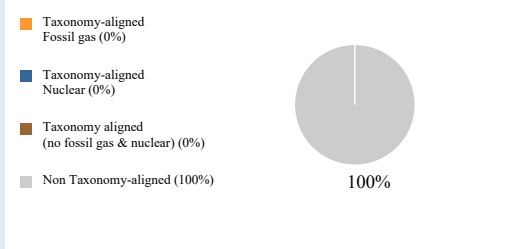
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

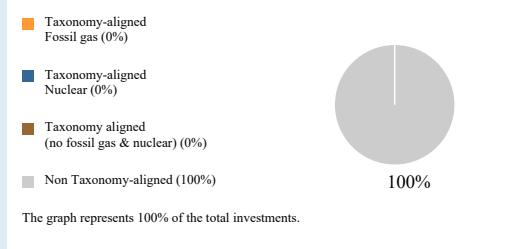
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### **What is the minimum share of socially sustainable investments?**

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund's annual report.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for inclusions, exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)



## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes

No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.

- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the "SDGs"). The fund's investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation;

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund's sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the "SDG Model"). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer's activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model.

In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

## **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

## **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 5% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

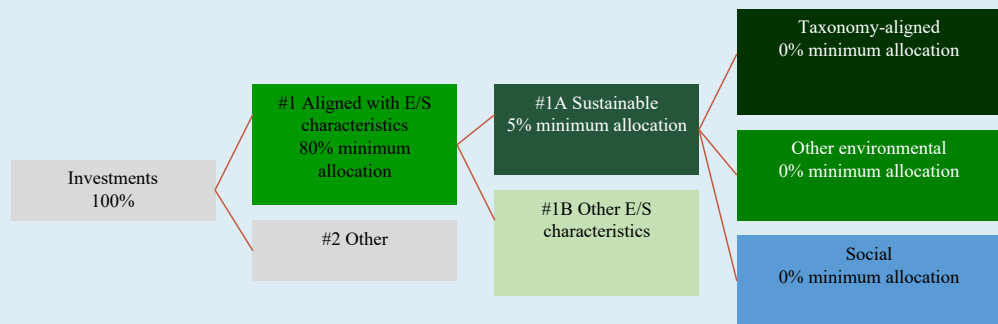
The fund has a minimum allocation to sustainable investments of 5% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
  - In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

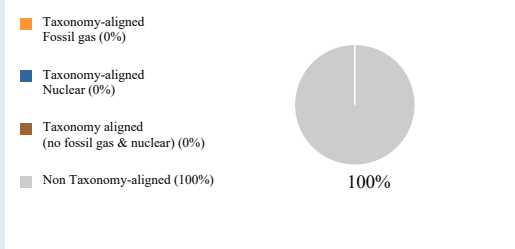
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

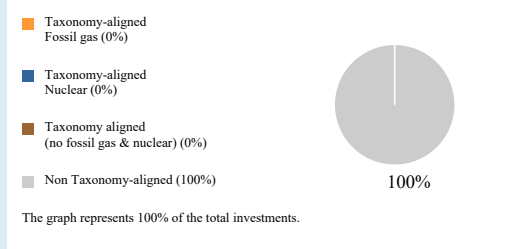


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund’s annual report.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for exclusions, or covered by the fund’s active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

Does this financial product have a sustainable investment objective?

Yes

No

- It will make a minimum of sustainable investments with an environmental objective: 25%
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective: 25%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 80% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What is the sustainable investment objective of this financial product?

The fund's sustainable investment objective is to contribute to the United Nations Sustainable Development Goals (the "SDGs") and accelerate the transition to a sustainable economy. Climate Stability, Natural Capital and Social Equity are main SDG themes selected by this fund. The fund's investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments. The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world. Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable

Development (also a social SDG). The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG). The sustainable investments of the fund contribute positively to at least one of these environmental and/or social objectives, with special emphasis on SDGs 3, 6, 7, 8, 9, 10 and 13. The fund has not defined a minimum contribution target for each of the 17 SDGs, and the specific contribution may vary for the fund's sustainable investments.

□ The contribution to the UN Sustainable Development Goals is achieved mainly through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operational aspects, using data and assessments from external data providers. An issuer's activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. The model assesses operational aspects relatively on the basis of estimates (proxies) related to the sector in which the issuer is active. In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis. Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments. Further details on the SDG Model are available at: [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger) The SDG Model applied to the fund is supplemented by a process in which a number of critical contribution points (“CCPs”) are defined for each individual issuer. Based on these CCPs, a number of SDG-aligned requirements are defined for the individual issuers. The issuer is measured against these requirements and must demonstrate acceleration towards them in order to document its contribution to the individual SDGs. The approach to the CCPs is described in more detail in “What investment strategy does this financial product follow?”.

The fund also applies the following environmental and/or social characteristics in its efforts to achieve its sustainable investment objective:

- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.

- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics.

The fund does not apply a specific index as reference benchmark to attain its sustainable investment objective.

### **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The fund applies the following sustainability indicators to attain its sustainable investment objective:

- Revenue figures for issuers in the portfolio linked to activities contributing to the UN SDGs and estimates (scores) for issuers' contributions through operations measured relative to the relevant sector environment (see also "What is the sustainable investment objective of this financial product?" above).
- Indicators for how issuers in the portfolio have made progress in terms of delivering on their tailored critical contribution points (CCPs). Through the CCPs, issuers are evaluated on the attainment of the targets underpinning the SDGs.
- The fund's weighted ESG score is based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (issuers excluded if revenue related to that activity exceeds 5%),thermal coal (>5% of revenue),peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),military equipment (>5% of revenue),alcohol (>5% of revenue),commercial gambling (>5% of revenue),pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU")and the number of issuers excluded as a result of these exclusions.
- Indicators mentioned in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

## How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Through its general exclusions, the SDG Model and the fixed thresholds for the PAI Indicators, the fund ensures that its investments do not cause significant harm to any environmental or social sustainable objectives. The fund cannot invest in issuers that transgress those thresholds (see “How have the indicators for adverse impacts on sustainability factors been taken into account?” below). The SDG Model supplements the general exclusions through enhanced screening e.g. for norm-based violations.

## How have the indicators for adverse impacts on sustainability factors been taken into account?

The fund takes into account indicators of negative impacts on sustainability factors based on thresholds defined for the PAI Indicators, which apply to all of the fund’s direct investments. The thresholds have been defined for indicators of greenhouse gas emissions, sector exposure to fossil fuels, 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. Even where an investment is deemed to provide a positive environmental and/or social contribution according to the SDG Model or in terms of CCPs, and is not captured by the exclusions applied by the fund, the fund cannot make the investment if the investment does not comply with the thresholds applying to these indicators at any time. 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 an environmental or social objective. This assessment is revised continuously in step with improvements in underlying data and developments in the understanding of “no significant harm”. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at: [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on the enhanced sustainability screening, which screens issuers for compliance 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. Similarly, screening provides general assurance that the fund’s investments do not significantly harm a social objective.

## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund takes account of principal adverse impacts on sustainability factors. This is achieved through screening and analysis forming the basis for the fund’s general exclusions, inclusions (including through the use of the SDG Model), thresholds for PAI Indicators (see also “How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?”), monitoring and, as relevant, handling and prioritising through active ownership activities. The fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions secure the consideration for voting on proposals at general meetings in companies in which the fund is a shareholder, and which are linked to the issuers’ principal adverse impacts on sustainability factors. Similar considerations apply to the need for direct engagement with issuers underperforming in relation to these indicators. Information on the principal adverse impacts of the fund’s investments on sustainability factors is provided in the fund’s annual report.

No



Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights as well as anti-corruption and anti-bribery matters.



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The fund invests in sustainable investments that support its sustainable investment objective. In line with its strategy, the fund selects issuers with a positive and measurable contribution to one or more of the UN SDGs as measured according to the SDG Model and/or the CCPs. This is an active component of the screening and the investment analysis forming the basis of the fund's investments. The CCPs (targets) are defined to ensure that issuers take the necessary steps to and progress towards contributing to the SDGs. Investment in an issuer is subject to the fund being able to set credible targets. Typically, primary, secondary and tertiary targets are set. These targets are defined prior to investment and are evaluated on an ongoing basis. If an issuer does not deliver on the targets as expected, the fund will engage with the issuer to assess the probability of the issuer meeting its targets, with divestment as a potential end-result. The analysis performed using the SDG Model takes into account the products and/or services of the issuers. Operational aspects, i.e. how the issuers make their products or provide their services, are also taken into consideration in the SDG Model. The SDG Model facilitates qualitative analyses of the issuers' activities in supplement to the quantitative elements of the model in case of shortage of data for the quantitative analysis and/or inaccurate data. The fund's investment strategy ensures that the "to do no significant harm" principle is promoted through exclusions, the SDG Model and thresholds for the PAI Indicators. Moreover, the fund practises active ownership by engaging with issuers on material sustainability topics, including suggestions to help meet the fund's sustainable investment objectives, and by voting on environmental and/or social proposals consistent with Danske Invest Management A/S's Active Ownership Policy. The investment strategy is implemented on a continuous basis through a commitment to systematically identifying and addressing relevant sustainability factors for the whole process. The fund's environmental investment objectives and further considerations as to other environmental and/or social characteristics and good governance practices can and will influence a decision to either buy or increase positions, hold or maintain weighting or sell or decrease weighting. Investments that no longer meet the fund's criteria for sustainable investments, e.g. due to changes in the assessment of their activities, are divested with due regard for other investor protection considerations. The fund's performance in respect of meeting sustainable investment objectives is reported in the annual report.

## What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

"Sustainable investments": The fund invests solely in sustainable investments that contribute to the its environmental and/or social objective. The fund may to a limited extent make investments that are considered non-sustainable, provided such investments are used for hedging purposes and/or relate to cash funds held for liquidity purposes.

"Sound sustainability practices": The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

"Sound environmental stewardship": The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to the Responsible Investment Policy, the fund – having a sustainable investment objective – must consider good governance in its investments. This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S. The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and ILO Conventions. With respect to good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening. For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.



## What is the asset allocation and the minimum share of sustainable investments?

Asset allocation describes the share of investments in specific assets.

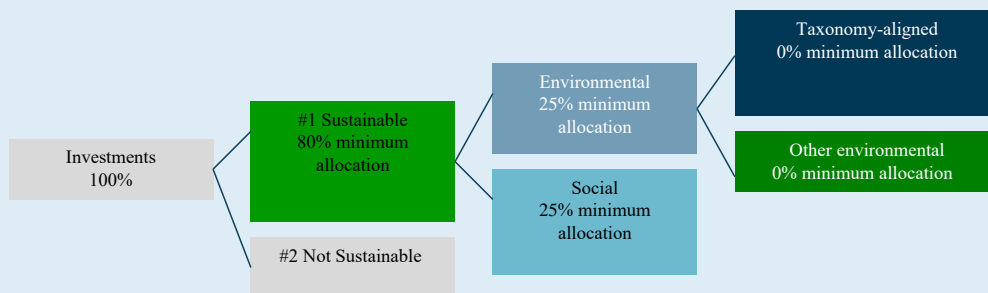
The fund invests in sustainable investments that contribute to the fund's environmental and social objectives. The fund may also make investments for risk hedging and liquidity purposes ("non-sustainable investments"). The minimum allocation applying to the fund's sustainable investments is 80% with 20% of the fund's total investments being reserved for potentially necessary non-sustainable investments. The fund's sustainable investments are allocated between investments supporting environmental objectives (minimum allocation of 25%) and investments supporting social objectives (minimum allocation of 25%). The remaining part of the fund's sustainable investments can be freely allocated between other environmental investments or investments supporting a social objective to ensure an appropriate portfolio composition. The fund does not have a minimum share of investments targeting economic activities that qualify as environmentally sustainable under the EU Taxonomy.

The calculation of the fund's minimum allocation is based on the weighted share of the fund's sustainable investments relative to the total market value of the assets. The fund's actual exposure to sustainable investments will either correspond to or exceed the minimum allocation, subject to sector-specific requirements that may, in exceptional circumstances, require the fund to exceed the 20% bucket for non-sustainable investments to allow for redemption of investors, etc. Average minimum allocations are reported in the fund's annual report.



Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments

## How does the use of derivatives attain the sustainable investment objective?

The fund does not use derivatives to attain its sustainable investment objective.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does this financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

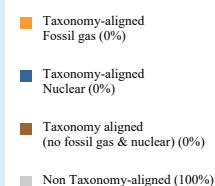
In order to comply with the EU Taxonomy, the criteria for fossil gas include emission limitations and transition to fully renewable energy or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and whose greenhouse gas emission levels match best performance, among other things.

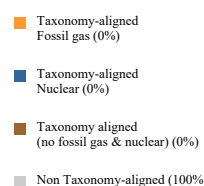
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



### **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%. The actual level is reported in the fund's annual report. The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

"The minimum share of sustainable investments with an environmental objective not consistent with the EU Taxonomy" consists of environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy



### **What is the minimum share of sustainable investments with a social objective?**

The minimum share of sustainable investments with a social objective in the fund is 25%. The actual level is reported in the fund's annual report.



### **What investments are included under '#2 Not sustainable', what is their purpose and are there any minimum environmental or social safeguards?**

The fund may invest in non-sustainable investments, provided such non-sustainable investments are used for hedging purposes or relate to cash funds held as ancillary liquidity.

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards for this purpose. The reason is that such investments will not directly support or finance activities (including economic activities) that may potentially conflict with minimum environmental or social safeguards.



### **Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

The fund does not apply a reference index for the purpose of meeting the sustainable investment objective. Accordingly, questions related to the reference benchmark are not relevant for this fund.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.



### **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

Does this financial product have a sustainable investment objective?

Yes

No

- It will make a minimum of sustainable investments with an environmental objective: 25%
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective: 25%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 80% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What is the sustainable investment objective of this financial product?

The fund's sustainable investment objective is to contribute to the United Nations Sustainable Development Goals (the "SDGs") and accelerate the transition to a sustainable economy. Climate Stability, Natural Capital and Social Equity are main SDG themes selected by this fund. The fund's investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments. The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world. Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable

Development (also a social SDG). The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG). The sustainable investments of the fund contribute positively to at least one of these environmental and/or social objectives, with special emphasis on SDGs 3, 6, 7, 8, 9, 10 and 13. The fund has not defined a minimum contribution target for each of the 17 SDGs, and the specific contribution may vary for the fund's sustainable investments.

□ The contribution to the UN Sustainable Development Goals is achieved mainly through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operational aspects, using data and assessments from external data providers. An issuer's activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. The model assesses operational aspects relatively on the basis of estimates (proxies) related to the sector in which the issuer is active. In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis. Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments. Further details on the SDG Model are available at: [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger) The SDG Model applied to the fund is supplemented by a process in which a number of critical contribution points (“CCPs”) are defined for each individual issuer. Based on these CCPs, a number of SDG-aligned requirements are defined for the individual issuers. The issuer is measured against these requirements and must demonstrate acceleration towards them in order to document its contribution to the individual SDGs. The approach to the CCPs is described in more detail in “What investment strategy does this financial product follow?”.

The fund also applies the following environmental and/or social characteristics in its efforts to achieve its sustainable investment objective:

- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.

- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics.

The fund does not apply a specific index as reference benchmark to attain its sustainable investment objective.

### **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The fund applies the following sustainability indicators to attain its sustainable investment objective:

- Revenue figures for issuers in the portfolio linked to activities contributing to the UN SDGs and estimates (scores) for issuers' contributions through operations measured relative to the relevant sector environment (see also "What is the sustainable investment objective of this financial product?" above).
- Indicators for how issuers in the portfolio have made progress in terms of delivering on their tailored critical contribution points (CCPs). Through the CCPs, issuers are evaluated on the attainment of the targets underpinning the SDGs.
- The fund's weighted ESG score is based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (issuers excluded if revenue related to that activity exceeds 5%),thermal coal (>5% of revenue),peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),military equipment (>5% of revenue),alcohol (>5% of revenue),commercial gambling (>5% of revenue),pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU")and the number of issuers excluded as a result of these exclusions.
- Indicators mentioned in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

## How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Through its general exclusions, the SDG Model and the fixed thresholds for the PAI Indicators, the fund ensures that its investments do not cause significant harm to any environmental or social sustainable objectives. The fund cannot invest in issuers that transgress those thresholds (see “How have the indicators for adverse impacts on sustainability factors been taken into account?” below). The SDG Model supplements the general exclusions through enhanced screening e.g. for norm-based violations.

## How have the indicators for adverse impacts on sustainability factors been taken into account?

The fund takes into account indicators of negative impacts on sustainability factors based on thresholds defined for the PAI Indicators, which apply to all of the fund’s direct investments. The thresholds have been defined for indicators of greenhouse gas emissions, sector exposure to fossil fuels, 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. Even where an investment is deemed to provide a positive environmental and/or social contribution according to the SDG Model or in terms of CCPs, and is not captured by the exclusions applied by the fund, the fund cannot make the investment if the investment does not comply with the thresholds applying to these indicators at any time. 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 an environmental or social objective. This assessment is revised continuously in step with improvements in underlying data and developments in the understanding of “no significant harm”. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at: [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on the enhanced sustainability screening, which screens issuers for compliance 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. Similarly, screening provides general assurance that the fund’s investments do not significantly harm a social objective.

## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund takes account of principal adverse impacts on sustainability factors. This is achieved through screening and analysis forming the basis for the fund’s general exclusions, inclusions (including through the use of the SDG Model), thresholds for PAI Indicators (see also “How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?”), monitoring and, as relevant, handling and prioritising through active ownership activities. The fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions secure the consideration for voting on proposals at general meetings in companies in which the fund is a shareholder, and which are linked to the issuers’ principal adverse impacts on sustainability factors. Similar considerations apply to the need for direct engagement with issuers underperforming in relation to these indicators. Information on the principal adverse impacts of the fund’s investments on sustainability factors is provided in the fund’s annual report.

No



Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights as well as anti-corruption and anti-bribery matters.



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The fund invests in sustainable investments that support its sustainable investment objective. In line with its strategy, the fund selects issuers with a positive and measurable contribution to one or more of the UN SDGs as measured according to the SDG Model and/or the CCPs. This is an active component of the screening and the investment analysis forming the basis of the fund's investments. The CCPs (targets) are defined to ensure that issuers take the necessary steps to and progress towards contributing to the SDGs. Investment in an issuer is subject to the fund being able to set credible targets. Typically, primary, secondary and tertiary targets are set. These targets are defined prior to investment and are evaluated on an ongoing basis. If an issuer does not deliver on the targets as expected, the fund will engage with the issuer to assess the probability of the issuer meeting its targets, with divestment as a potential end-result. The analysis performed using the SDG Model takes into account the products and/or services of the issuers. Operational aspects, i.e. how the issuers make their products or provide their services, are also taken into consideration in the SDG Model. The SDG Model facilitates qualitative analyses of the issuers' activities in supplement to the quantitative elements of the model in case of shortage of data for the quantitative analysis and/or inaccurate data. The fund's investment strategy ensures that the "to do no significant harm" principle is promoted through exclusions, the SDG Model and thresholds for the PAI Indicators. Moreover, the fund practises active ownership by engaging with issuers on material sustainability topics, including suggestions to help meet the fund's sustainable investment objectives, and by voting on environmental and/or social proposals consistent with Danske Invest Management A/S's Active Ownership Policy. The investment strategy is implemented on a continuous basis through a commitment to systematically identifying and addressing relevant sustainability factors for the whole process. The fund's environmental investment objectives and further considerations as to other environmental and/or social characteristics and good governance practices can and will influence a decision to either buy or increase positions, hold or maintain weighting or sell or decrease weighting. Investments that no longer meet the fund's criteria for sustainable investments, e.g. due to changes in the assessment of their activities, are divested with due regard for other investor protection considerations. The fund's performance in respect of meeting sustainable investment objectives is reported in the annual report.

## What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

"Sustainable investments": The fund invests solely in sustainable investments that contribute to the its environmental and/or social objective. The fund may to a limited extent make investments that are considered non-sustainable, provided such investments are used for hedging purposes and/or relate to cash funds held for liquidity purposes.

"Sound sustainability practices": The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

"Sound environmental stewardship": The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.



## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to the Responsible Investment Policy, the fund – having a sustainable investment objective – must consider good governance in its investments. This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S. The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and ILO Conventions. With respect to good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening. For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.



## What is the asset allocation and the minimum share of sustainable investments?

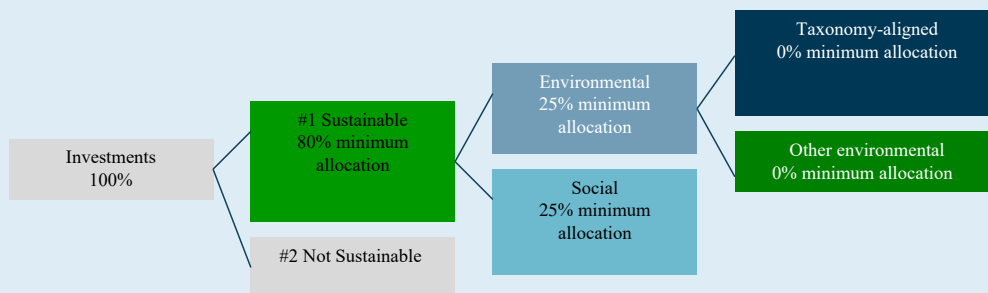
Asset allocation describes the share of investments in specific assets.

The fund invests in sustainable investments that contribute to the fund's environmental and social objectives. The fund may also make investments for risk hedging and liquidity purposes ("non-sustainable investments"). The minimum allocation applying to the fund's sustainable investments is 80% with 20% of the fund's total investments being reserved for potentially necessary non-sustainable investments. The fund's sustainable investments are allocated between investments supporting environmental objectives (minimum allocation of 25%) and investments supporting social objectives (minimum allocation of 25%). The remaining part of the fund's sustainable investments can be freely allocated between other environmental investments or investments supporting a social objective to ensure an appropriate portfolio composition. The fund does not have a minimum share of investments targeting economic activities that qualify as environmentally sustainable under the EU Taxonomy.

The calculation of the fund's minimum allocation is based on the weighted share of the fund's sustainable investments relative to the total market value of the assets. The fund's actual exposure to sustainable investments will either correspond to or exceed the minimum allocation, subject to sector-specific requirements that may, in exceptional circumstances, require the fund to exceed the 20% bucket for non-sustainable investments to allow for redemption of investors, etc. Average minimum allocations are reported in the fund's annual report.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments

## How does the use of derivatives attain the sustainable investment objective?

The fund does not use derivatives to attain its sustainable investment objective.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does this financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

- Yes
- In fossil gas
- In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

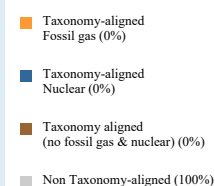
In order to comply with the EU Taxonomy, the criteria for fossil gas include emission limitations and transition to fully renewable energy or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and whose greenhouse gas emission levels match best performance, among other things.

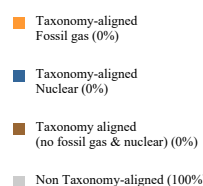
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



### **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%. The actual level is reported in the fund's annual report. The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

"The minimum share of sustainable investments with an environmental objective not consistent with the EU Taxonomy" consists of environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy



### **What is the minimum share of sustainable investments with a social objective?**

The minimum share of sustainable investments with a social objective in the fund is 25%. The actual level is reported in the fund's annual report.



### **What investments are included under '#2 Not sustainable', what is their purpose and are there any minimum environmental or social safeguards?**

The fund may invest in non-sustainable investments, provided such non-sustainable investments are used for hedging purposes or relate to cash funds held as ancillary liquidity.

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards for this purpose. The reason is that such investments will not directly support or finance activities (including economic activities) that may potentially conflict with minimum environmental or social safeguards.



### **Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

The fund does not apply a reference index for the purpose of meeting the sustainable investment objective. Accordingly, questions related to the reference benchmark are not relevant for this fund.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.



### **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes

No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue)and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest

Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

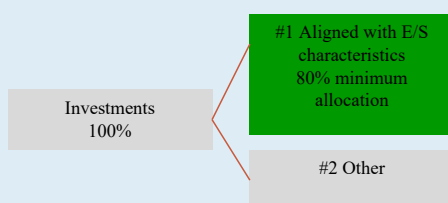
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.





## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

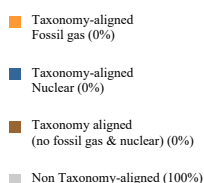
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

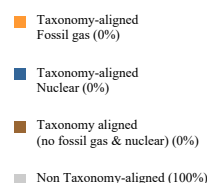
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 93% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
  - in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund aims to support the UN Sustainable Development Goals by investing part of its assets in sustainable investments contributing towards these goals.
- The fund promotes sound sustainability practices through the inclusion and weighting of issuers demonstrating responsible handling of environmental, social and governance issues.
- The fund promotes sound environmental stewardship through the inclusion and weighting of issuers demonstrating responsible handling of environmental matters assessed against climate-related parameters.
- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.

- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of investments in the fund contributing to the UN SDGs and deemed to be sustainable investments (for additional information, see also "What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?")
- The fund's weighted ESG score based on a model developed by Danske Bank A/S (sound sustainability practices).
- The fund's weighted carbon risk rating based on a score provided by an external data provider (sound environmental stewardship).
- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

## **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The fund partially invests in sustainable investments. The sustainable investments of the fund contribute positively to the attainment of environmental objectives and/or social objectives covered by the UN Sustainable Development Goals (the “SDGs”). The fund’s investment strategy does not involve contributing directly to environmental objectives aligned with the EU Taxonomy (environmentally sustainable economic activities) as the fund has not defined a minimum obligation for such investments.

The UN SDGs consist of 17 goals adopted by the UN member states in 2015 with the aim of shaping a common international vision and setting a direction for a more equal, just and sustainable world.

Specifically, the environmental SDGs are: Clean Water and Sanitation (SDG 6) to ensure availability and sustainable management of water and sanitation for all; Affordable and Clean Energy (SDG 7) to ensure access to affordable, reliable, sustainable and modern energy for all; Industry, Innovation and Infrastructure (SDG 9) to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; Sustainable Cities and Communities (SDG 11) to make cities and human settlements inclusive, safe, resilient and sustainable; Responsible Consumption and Production (SDG 12) to ensure sustainable consumption and production patterns; Climate Action (SDG 13) to take urgent action to combat climate change and its impacts; Life below Water (SDG 14) to conserve and sustainably use the oceans, seas and marine resources for sustainable development; Life on Land (SDG 15) to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development (also a social SDG).

The social SDGs are: No Poverty (SDG 1) to end poverty in all its forms everywhere; Zero Hunger (SDG 2) to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; Good Health and Well-being (SDG 3) to ensure healthy lives and promote well-being for all at all ages; Quality Education (SDG 4) to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; Gender Equality (SDG 5) to achieve gender equality and empower all women and girls; Decent Work and Economic Growth (SDG 8) to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Reduced Inequalities (SDG 10) to reduce inequality; Peace, Justice and Strong Institutions (SDG 16) to promote peaceful and inclusive societies, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; and Partnerships for the Goals (SDG 17) to strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development (also an environmental SDG).

The sustainable investments of the fund contribute positively to at least one of these environmental and/or social goals, but the fund has not defined a minimum contribution target for each of the 17 SDGs. The specific contribution may vary for the fund’s sustainable investments.

The contribution to the UN Sustainable Development Goals is achieved through a screening process that identifies investments supporting one of the SDGs while also meeting the criteria for a sustainable investment as defined in a model developed by Danske Bank (the “SDG Model”). The SDG Model measures the contribution through activities and operations, using data and assessments from external data providers. An issuer’s activity contribution to the SDGs is measured in particular by way of revenue figures, such as annual revenue figures linked to education services within the healthcare sector (No Poverty), sustainable agriculture (Zero Hunger), disease treatment (Good Health and Well-Being), education services (Quality Education & Gender Equality), waterworks (Clean Water and Sanitation), wind energy (Affordable and Clean Energy), loans for small businesses (Decent Work and Economic Growth), clean infrastructure (Industry, Innovation and Infrastructure), education services (Reduced Inequalities), green buildings (Sustainable Cities and Communities), pollution prevention (Responsible Consumption and Production), hydropower (Climate Action), wastewater treatment (Life below Water), or recycling (Life on Land). Contributions to the SDGs on Peace, Justice and Strong Institutions and Partnership for the Goals are not measured based on activities in the SDG Model. In the model, contributions through operations are assessed relatively on the basis of estimates (proxies) related to the sector in which the issuer is active.

In case of a shortage of data, quantitative measurement points may be supplemented by qualitative analysis and underlying assumptions for this analysis.

Issuers may also meet the criteria for a sustainable investment under the SDG Model if their activities predominantly contribute to environmental objectives and are aligned with the EU Taxonomy. However, as mentioned above, the fund has no obligation to make such investments.

Further details on the SDG Model are available at:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The specific contribution may vary for the sustainable investments of the fund.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The consideration for not causing significant harm to any environmental or social objective is safeguarded through the fund's general exclusion criteria and according to the SDG Model.

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The sustainable investments of the fund take account of adverse impacts on sustainability factors through the general exclusions and the thresholds for the PAI Indicators.

The SDG Model applies thresholds for the PAI Indicators (greenhouse gas emissions, sector exposure to fossil fuels, 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). Investments that exceed these thresholds are deemed to significantly harm the environmental and/or social objective and are not considered to be sustainable investments as per the model.

Thresholds are adjusted continuously in step with and as and when the underlying data are improved and the understanding of "no significant harm" is developed. To see the current thresholds, please refer to the sustainability-related disclosures of the fund at:

[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

The fund applies the exclusion criterion for socially harmful activities and conduct. This exclusion criterion is based on enhanced sustainability screening, which screens issuers for compliance 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.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions, thresholds for the fund's sustainable investments, inclusion criteria, and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

The exclusions are supplemented by pre-trade warnings raising a red flag to portfolio managers in cases where pre-determined thresholds defined for the PAI Indicators are exceeded in connection the buying securities.

When making sustainable investments, the fund has a heightened focus on the considerations for principal adverse impacts in order to ensure that its sustainable investments do not cause any significant harm to a social or an environmental objective.

The inclusion criteria for sound sustainability practices and environmental stewardship applied by the fund prioritise a weighting of issuers deemed to perform well on social, environmental as well as governance related parameters. This also involves considerations for indicators of significant adverse impacts on sustainability factors.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

The fund partially invests in sustainable investments. For these investments, the fund applies an investment strategy aligned with the UN SDGs, meaning that the SDGs are actively used in the screening and the investment analyses leading to the investment decision. An investment that positively contributes to at least one of the UN SDGs as per the SDG Model is eligible as a sustainable investment.

Moreover, the investment strategy integrates sustainability factors through the fund's inclusions, exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



## **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

“Sustainable investments”: The fund invests a minimum of 15% of its assets under management in sustainable investments that contribute to the UN SDGs and adheres to the “do no significant harm” principle as well as principles of good governance (as discussed above and in “Good governance” below).

“Sound sustainability practices”: The fund seeks to achieve a good ESG score at portfolio level, defined as a score exceeding 40.

“Sound environmental stewardship”: The fund seeks to achieve a good carbon risk rating score at portfolio level, defined as a score exceeding 40.

For exclusions related to “activities or conduct harmful to society”, “activities with significant negative climate impact” and “non-ethical and controversial activities”, the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## **What is the policy to assess good governance practices of the investee companies?**

Danske Invest Management A/S’s Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers’ governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund’s investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

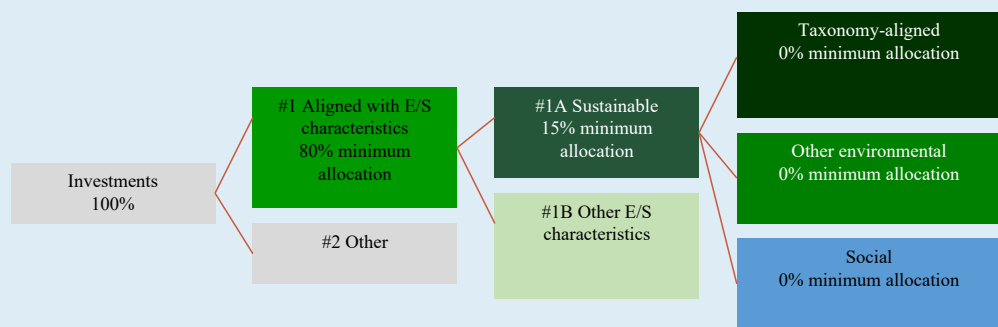
The fund has a minimum allocation to sustainable investments of 15% and does not within that allocation commit to a minimum allocation for environmentally sustainable investments, including Taxonomy-aligned investments, or socially sustainable investments.

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

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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

## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes  
 In fossil gas  
 In nuclear energy  
 No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

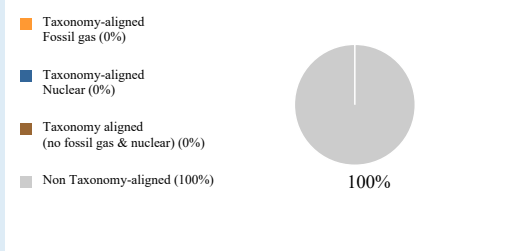
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

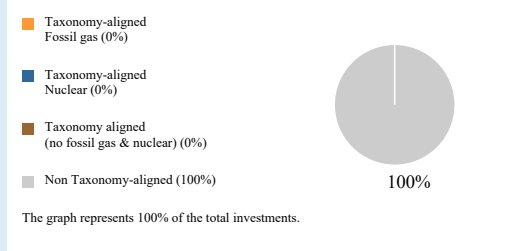
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

### What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund's annual reporting.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund invests in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy (environmentally sustainable economic activities). The fund has not allocated a fixed minimum share of its investments to such investments. As a result, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

The actual level is reported in the fund's annual report.

The fund invests in sustainable investments with an environmental objective that are not environmentally sustainable activities, because activities covered by the EU Taxonomy do not fully cover the achievement of the environmental objectives targeted by the fund's partially sustainable investments. In addition, the lack of reported data from issuers makes it difficult to determine whether issuers have activities that comply with the EU Taxonomy.

“The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy” are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

The fund does not have a minimum share of sustainable investments with a social objective. Therefore, the minimum share of sustainable investments with a social objective is 0%.

The actual level is reported in the fund’s annual report.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not sustainable investments, covered by the fund's screening for inclusions, exclusions, or covered by the fund’s active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



### Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %  
 in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments  
 with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  
 with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  
 with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental

and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

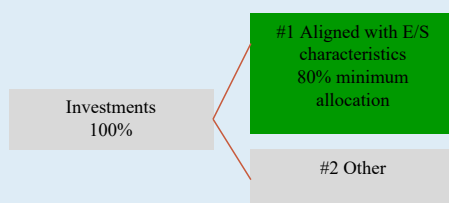
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

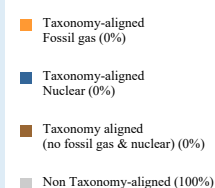
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

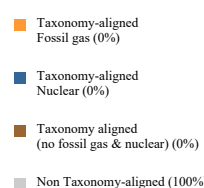
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

It will make a minimum of sustainable investments with an environmental objective: %

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of sustainable investments with a social objective \_\_\_%

It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

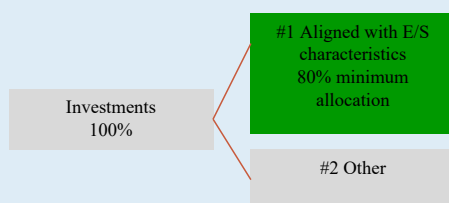


Asset allocation describes the share of investments in specific assets.



Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

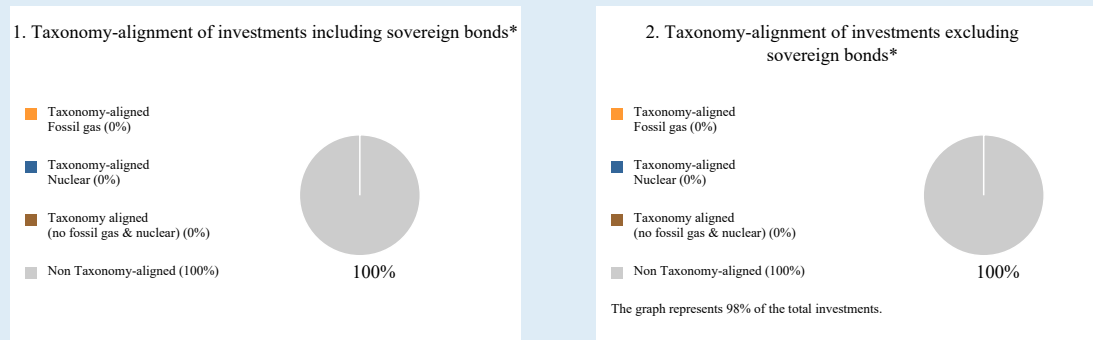
\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

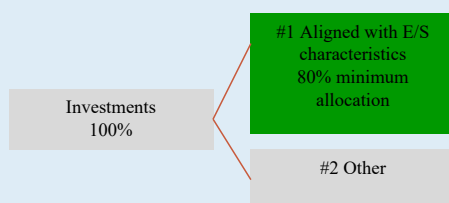
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.



## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

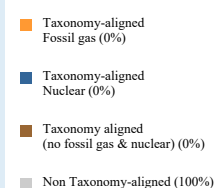
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

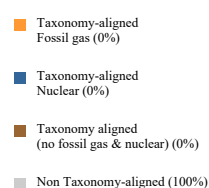
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 60% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

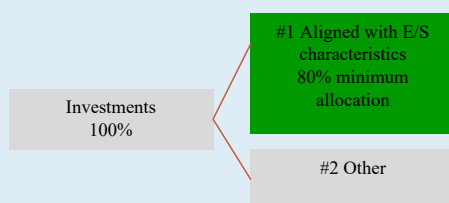
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

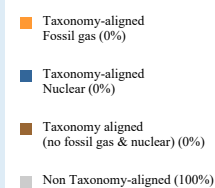
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

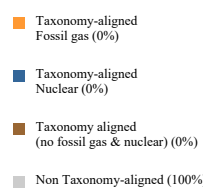
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.





## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue), fossil fuels (>5% of revenue, the threshold does not apply to utilities deemed to comply with Danske Bank A/S's Net Zero guidelines) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

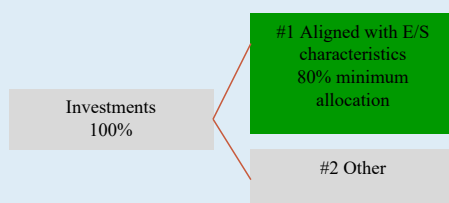
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

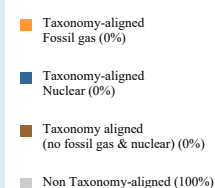
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

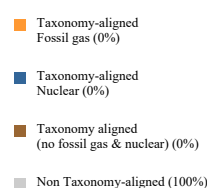
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 98% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)



## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU")and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- ✓ Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusionsand by monitoring and, as relevant, handling and prioritising through active ownership activities.The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

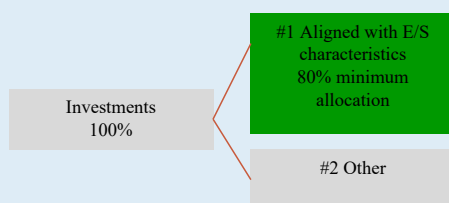
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

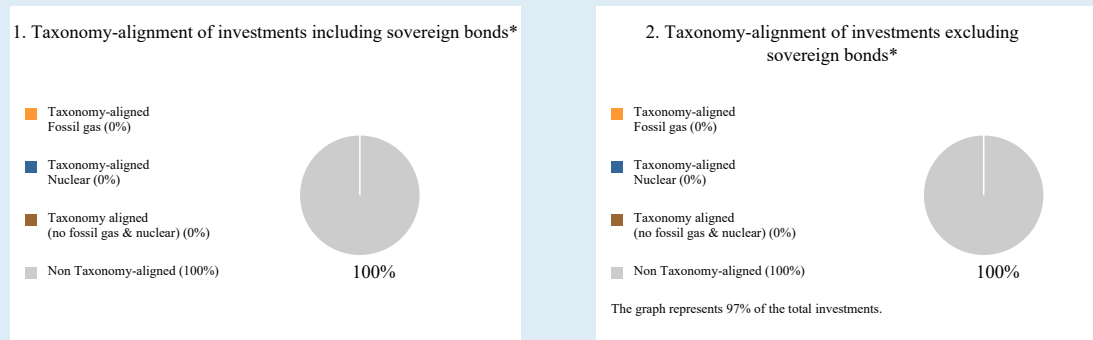
\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of sustainable investments with an environmental objective: %



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective \_\_\_%



It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics



The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists fortar sands (>5% of revenue),thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative),peat-fired power generation (>5% of revenue)and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists fortobacco (>5% of revenue),controversial weapons (>0% of revenue),pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU")and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusionsand by monitoring and, as relevant, handling and prioritising through active ownership activities.The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

No

## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the policy to assess good governance practices of the investee companies?

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

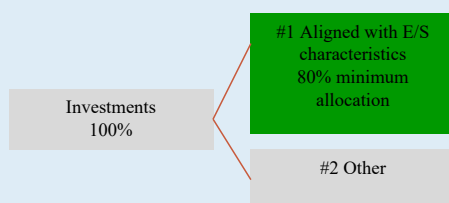
The minimum allocation is calculated against the total market value of the fund's assets under management, reflecting the average anticipated minimum allocation for the relevant reporting period.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

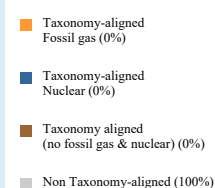
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

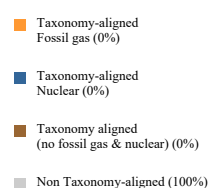
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



The graph represents 97% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators").
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.





## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

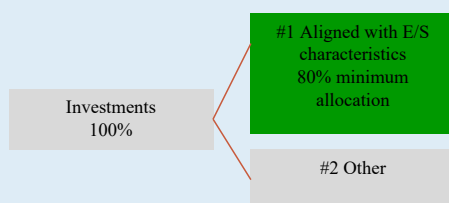
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

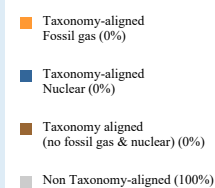
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

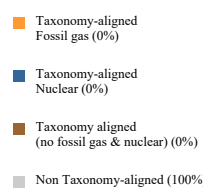
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Where can I find more product specific information online?

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes   No

- It will make a minimum of sustainable investments with an environmental objective: %
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective \_\_\_%
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments



### What environmental and/or social characteristics are promoted by this financial product?

The fund has the following environmental and/or social characteristics:

- The fund promotes adherence to certain UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, ILO Conventions and other international minimum safeguards through the exclusion of issuers deemed to have socially harmful activities and conduct.
- The fund promotes certain minimum environmental safeguards through the exclusion of issuers deemed to have activities with significant negative climate impacts.
- The fund promotes certain minimum ethical and social safeguards through the exclusion of issuers deemed to have unethical and/or controversial activities.
- The fund takes account of the investments' principal adverse impacts on sustainability factors.
- The fund seeks to influence issuers' approach to sustainability aspects through active ownership in relation to certain material sustainability topics

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

### **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

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

- The share of the fund's investments with socially harmful activities and conduct as identified through Danske Bank A/S's norm-based screening (enhanced sustainability screening) and the number of issuers excluded based on the screening criteria.
- The share of investments in the fund with significant negative climate impact as identified through exclusion lists for tar sands (>5% of revenue), thermal coal (>5% of revenue, unless the issuer has a credible transitional plan assessed on the basis of data from the Transition Pathway Initiative), peat-fired power generation (>5% of revenue) and the number of issuers excluded as a result of these exclusions.
- The share of the fund's investments with non-ethical and/or controversial activities as identified through exclusion lists for tobacco (>5% of revenue), controversial weapons (>0% of revenue), military equipment (>5% of revenue), alcohol (>5% of revenue), commercial gambling (>5% of revenue), pornography (>1% of revenue), Norges Bank, the Norwegian central bank (referred to as "Statens Pensjons Utland" – "SPU") and the number of issuers excluded as a result of these exclusions.
- Indicators listed in Danske Invest Management A/S's statement on principal adverse impacts of investment decisions on sustainability factors (pai\_statement\_en.pdf (danskeinvest.dk) ("PAI Indicators")).
- The number of dialogues with issuers in accordance with Danske Invest Management A/S's Active Ownership Policy.
- The number of environmental and/or social proposals voted on in accordance with Danske Invest Management A/S's Active Ownership Policy.

Further details on the fund's indicators are available at [www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the fund considers the principal adverse impacts on sustainability factors in screening, which form the basis for the fund's general exclusions and by monitoring and, as relevant, handling and prioritising through active ownership activities. The fund assesses the PAI Indicators that are relevant to the asset classes in which the fund is invested.

The general exclusion criteria applied by the fund take into account significant climate-related sustainability factors by excluding issuers with significant negative climate impacts. Considerations for other environmental and social sustainability factors are taken into consideration through the enhanced sustainability standards screening, focusing broadly on sustainability factors associated with issuers and emphasising both environmental and social indicators. Issuers captured by this screening are excluded as being deemed to have activities or conduct harmful to society.

In respect of active ownership, the fund is covered by the Active Ownership Policy of Danske Invest Management A/S, which is based on frameworks defined for the Danske Bank Group. The policy and underlying instructions safeguard, to the extent relevant and depending on the asset class, the consideration for voting at general meetings and engaging directly with issuers that underperform with regard to these indicators and/or that in certain regards are not considered to be in a proper transition.

Information on the principal adverse impacts of the fund's investments on sustainability factors is provided in its annual report.

- No



## What investment strategy does this financial product follow?

Information on the fund's general investment strategy is provided in section 5 "Fund Descriptions" in the prospectus.

Moreover, the investment strategy integrates sustainability factors through the fund's exclusions and active ownership. If deemed necessary, the fund will take active ownership measures to secure engagement with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The above is implemented in the investment process on a continuous basis through a commitment to systematically identifying and addressing 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 weighting of an investment. The same applies to considerations related to good governance practices.

## What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

For exclusions related to "activities or conduct harmful to society", "activities with significant negative climate impact" and "non-ethical and controversial activities", the fund excludes issuers appearing on exclusion lists of such exclusion criteria.

Considerations regarding investor protection may, in exceptional circumstances, including in case of low liquidity in the market, restrict the fund from disposing of an investment on the exclusion list. Such investments will be reported in the annual report and the information made publicly available.

In terms of active ownership, the fund engages with issuers on material sustainability topics in cases where (1) relevant factors specific to the issuer are identified; (2) it is possible to enter into a dialogue; and (3) it is assessed that individual or collective dialogue may influence the issuer. Shareholder proposals on environmental and/or social matters are handled in accordance with the Active Ownership Policy of Danske Invest Management A/S.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund has exclusions in place with the rate of reduction impacted by market value fluctuations and other factors. The fund does not commit to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

## What is the policy to assess good governance practices of the investee companies?

Danske Invest Management A/S's Responsible Investment Policy and Active Ownership Policy provide the basis for assessing and addressing the issuers' governance practices in the fund. According to these policies, the fund is required to secure the consideration for good governance in its investments.

This principle is adhered to through due diligence and investment analysis, including as a recurring element of the enhanced sustainability screening performed across the funds managed through Danske Invest Management A/S.

The enhanced sustainability screening process excludes, among others, issuers that fail to comply with international governance principles following from the UN Guiding Principles on Business, the OECD Guidelines for Multinational Enterprises and ILO Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined thresholds for management structures, employee relations, remuneration of staff and tax compliance. If a company does not comply with at least half of these thresholds, it is seen as an indication that the company does not meet the criteria for good governance overall. Such companies will be excluded from the fund's investments based on the enhanced sustainability screening.

For the management of its investments, the fund seeks to be an active owner and to address matters pertaining to good governance through active ownership, including collaboration with like-minded investors and stakeholders.

## What is the asset allocation planned for this financial product?

The fund promotes environmental and social characteristics with an expected minimum allocation of 80% of its assets. Minimum allocation means the share of the fund's assets that has been screened for the purpose of promoting the fund's environmental and social characteristics.

With respect to the rest of the assets, the fund reserves the right not to screen investments to assess whether they promote the environmental and social characteristics of the fund.

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

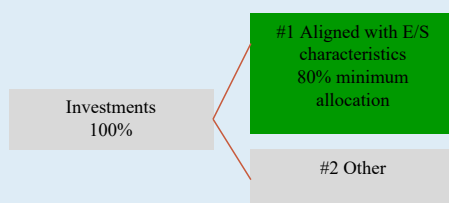
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- □ turnover reflecting the share of revenue from green activities of investee companies
- □ capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- □ operational expenditure (OpEx) reflecting green operational activities of investee companies.



#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.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics promoted by the fund.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund does not have a minimum commitment to make sustainable investments with an environmental objective aligned with the EU Taxonomy. As a result, the minimum extent to which the fund invests in sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.

The actual share of the fund's environmentally sustainable economic activities, if any, is reported in the fund's annual report. The fund identifies such investments through an external data provider, ISS ESG, which screens for activities contributing to environmental objectives under the EU Taxonomy and being considered to make a significant contribution to the environmental objectives in accordance with indicators defined under the EU Taxonomy. The screening furthermore involves the use of technical criteria for when an activity is deemed to do significant harm to other environmental objectives and is focused on the issuer's compliance with minimum safeguards with respect to human rights and labour rights.

In the calculation of the share of environmentally sustainable economic activities, revenue is used as a key indicator for investments in both financial and non-financial enterprises. The calculation is based on reported data from issuers provided for the fund through external data providers and, in the absence of such reporting, equivalent information from issuers or external data providers. In doing so, the fund or its data provider may apply assumptions for the data (proxies). These assumptions/estimates may vary from one data provider to the next.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy\*?

- Yes
- In fossil gas
  - In nuclear energy
- No

\*) Fossil gas and nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

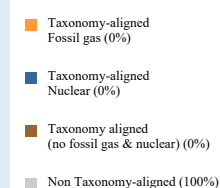
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

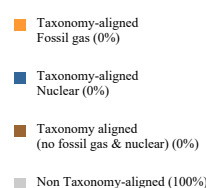
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



100%

2. Taxonomy-alignment of investments excluding sovereign bonds\*



100%

The graph represents 100% of the total investments.

\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

As the fund does not commit to investing in accordance with the EU Taxonomy, the minimum share of investments in transitional activities is 0%. Similarly, the minimum share of investments in enabling activities is 0%.

The actual share of these activities is reported as part of the fund’s annual reporting.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

#2 Other investments are investments of the fund that are not covered by the fund's screening for exclusions, or covered by the fund's active ownership activities. Such #2 Other investments may consist of investments made for purposes of obtaining sufficient liquidity, hedging of risk in the portfolio, or by investments for which there is insufficient ESG data (see also section 5 “Fund descriptions” in the prospectus for information on which instruments the fund may use).

Given the nature of the exposure obtained through such instruments, the fund does not apply minimum environmental or social safeguards to #Other investments.



## **Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not apply a specific index as a reference benchmark to determine whether the fund is aligned with the environmental and/or social characteristics that it promotes.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## **Where can I find more product specific information online?**

A range of product-specific information can be found on this website:  
[www.danskeinvest.dk/page/ansvarlige\\_investeringer\\_oplysninger](http://www.danskeinvest.dk/page/ansvarlige_investeringer_oplysninger)