

Sustainability-related Website Disclosure

Danske Managed Portfolio

On this page, you can find product specific information for the product on sustainability-related aspects. This information supplements the information in the pre-contractual disclosure.

Summary

The fund promotes environmental and/or social characteristics by partially making sustainable investments, inclusion of certain investments, exclusions and through its active ownership activities. While partially investing into sustainable investments the Product has no sustainable investment objective.

Further information on the explicit environmental and/or social characteristics promoted by the Product is outlined in this website disclosure with detailed information on the investment strategy used for the attainment of these characteristics, proportion of investments promoting the respective characteristics, monitoring, methodologies applied, data sources and processes as well as information on limitations to methodologies and data, due diligence, engagement policies and the extent to which an index is applied.

In summary, the investment strategy of the Product integrates the respective environmental and/or social characteristics through binding commitments on the investment managers of the Product to adhere to the integration of these aspects when managing the strategy. For instance, the binding elements implies that the investment manager of the Product does not invest into issuers on the exclusion list intending to reduce the Product's exposures to conduct and activities harmful to society.

As the Product reserves the opportunity of making investments that are not utilised for the attainment of the environmental and/or social characteristics (unscreened investments), you can find further information in this document on the actual split between investments used to promote the environmental and/social characteristics, other investments, and the extent to which exposures are sought through indirect investments.

Prudent monitoring is key to ensure that the environmental and/or social characteristics of the Product are integrated as intended. For that reason, a combination of so-called pre-trade and post-trade controls are in place to make sure that the Product is abiding to its commitments set-out in the SFDR appendix. You will find more information on these controls and how they apply to the specific characteristics in this document.

In respect to methodologies, the Product applies indicators ensuring that the extent to which environmental and/or social characteristics promoted is measured. This serves both for ongoing monitoring, but also enables us to report the performance of the Product against the relevant indicators to investors. As detailed in this website disclosure, methodologies are by data constraints and will substantially differentiate depending on the respective characteristic that the Product is promoting.

In general, data is key in order to successfully integrate sustainability factors into the investment strategy of the Product and thus enable the promotion of environmental and/or social characteristics. For the same reason, multiple ESG data sources served by different vendors are applied in the management of the Product. To ensure consistency in monitoring and reporting, some data points are only serviced by one vendor. This relates for instance to principal adverse impact reporting as well as EU Taxonomy reporting.

Due diligence (screening) of the investment universe for sustainability factors relevant to the commitments of the Product is done through a top-down approach in terms of screening relating to exclusions, impacting also other strategies, as well as a bottom-up approach in respect to considerations with sole impact on this Product (for instance assessments relevant to determine how an investment might impact the general sustainability-profile of the Product).

The engagement policies of Danske Bank form the foundation for the active ownership activities of the Product with further information available in our general policy and process descriptions as well as this document.

No designated index is applied by the Product for the attainment of the environmental and/or social characteristics.

NO SUSTAINABLE INVESTMENT OBJECTIVE

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

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The product promotes the following environmental or social characteristics:

Exclusions

The Product prioritises investments in funds that exclude issuers with:

- Activities or conduct harmful to society covering exclusions:
 - that comply with Danske Bank's norm based screening (enhanced sustainability standards) focussing, among others, on adherence to UN Global Compact principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and ILO conventions.
- Non-ethical or controversial activities covering exclusions on:
 - Tobacco (5 % revenue – with the scope capturing activities, Upstream, Production, and distribution, Downstream “UPD”)
 - Controversial weapons (0 % revenue – UPD)
- Activities with significant negative climate impact covering exclusions on:
 - Peat-fired power generation (5 % revenue – UPD)
 - Tar sands (5 % revenue – UPD)
 - Thermal coal (5% revenue – UPD)

Active ownership

The product seeks to influence investee companies' impact on sustainability matters through engagement and voting on material sustainability topics.

INVESTMENT STRATEGY

The Product uses an active management strategy and gains exposures to issuers through investments in underlying funds.

By the selection of underlying funds, the Product aims to ensure as an integral of its investment strategy that the Product's environmental and social characteristics are promoted

For the sustainable investments that the Product partially intends to make, the Product in its selection of underlying funds considers the sustainable investments made by that underlying fund, including sustainable investment objectives that the underlying fund supports and how such fund considers and manages considerations of do no significant harm.

The investment strategy of the Product is further focussed on limiting negative externalities / principal adverse impacts of investments by the integration of the exclusions. The Product engages as an active part of its investment strategy with issuers on material sustainability topics and vote on environmental and/or social proposals in accordance with Danske Bank A/S's Voting Guidelines and Voting Scope, primarily indirectly through active ownership activities of its underlying funds.

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

The extent to which the environmental and social characteristics of the Product are attained through the investment strategy is monitored on a regular basis and is reported in the Product's periodic report.

Assessment of good governance practices

Danske Bank A/S's Responsible Investments Policy and Active Ownership Policy provide the basis for assessing the issuers, as investee companies, good governance practices.

According to these policies, considerations related to good governance practices form an integral part of the investment process of the product, in respect to both the selection of issuers and in managing the portfolio. In this respect, the business models and the strategies of issuers as well as their ability to create long-term value for the shareholders are taken into consideration. The assessments are among others supported by an analytical tool in Danske Bank A/S.

For the selection of underlying funds, the manager's policies and frameworks for consideration of good governance practices are taken into consideration and form part of the due diligence and ongoing monitoring.

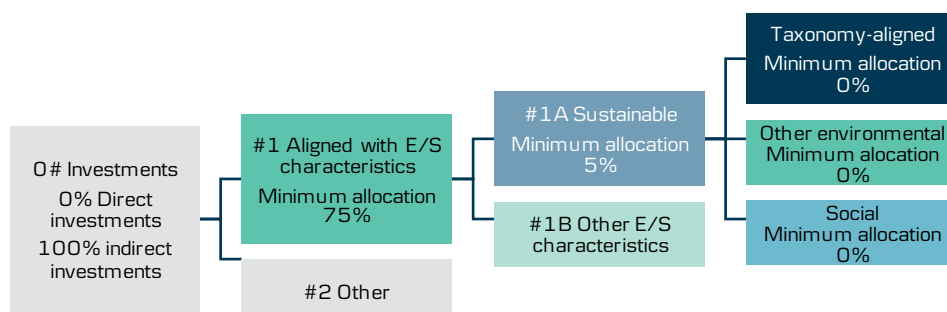
For the management of its investments, the Product further seeks to be an active owner through the underlying funds and to influence issuers through dialogue, voting and collaboration with peers, like-minded investors and stakeholders including on matters pertaining to good governance.

PROPORTION OF INVESTMENTS

The product promotes environmental and social characteristics with an expected minimum allocation of 75% of assets. The minimum allocation reflects the proportion of the product assets that have been screened to promote the environmental and social characteristics of the product.

For the remainder of the assets, the product reserves the right not to screen the investments and thus assess whether these investments promote the environmental and social characteristics of the product.

The minimum allocation is calculated against the total market value of the assets and reflects the expected minimum allocation as an average within the relevant reporting period.



#0. Investments includes all the investments of the financial product

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

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

MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

A number of processes are in place to monitor the promotion of environmental and/or social characteristics of the underlying Products.

First, the investment team managing the product and the underlying Danske Invest Products has access to a wide selection of ESG data and research through our ESG Data Platform that they use on an ongoing basis to assess new investments and monitor the underlying investments' performance and management of the relevant sustainability indicators of the product. Further information on the ESG Data Platform may be found under "Data Sources And Processes".

Moreover, the underlying Products are screened daily to ensure that the applicable investment restrictions are adhered to. The Responsible Investment team in Danske Bank is responsible for maintaining restriction lists that set out the companies and issuers that the underlying Danske Invest Product's is not permitted to hold.

There is also monitoring to ensure that the product is always at least 75% invested in underlying funds that promote the environmental and social characteristics of this product.

METHODOLOGIES

The attainment of the environmental or social characteristics promoted by the Product are measured as followed:

"Enhanced sustainability standards" is measured by the average number of companies restricted as a result of this exclusion.

"Reduction of involvement in non-ethical and controversial activities" is measured by the average number of companies restricted as a result of this exclusion.

"Reduction of activities resulting in significant negative impact on the climate" is measured by the average number of companies restricted as a result of this exclusion.

"Investee companies' impact on sustainability matters" is measured by the average

number of engagements, engagement themes as well as environmental and/or social proposals voted on.

Exclusions

All product exclusions are defined by specific criteria and definitions in Danske Bank's Instructions for Exclusions

For the expanded sustainability screening, which covers exclusions for socially damaging behavior and activities, please refer to the methodology descriptions at [esg-screening-in-investments.pdf](#) ([danskebank.com](#)).

For methods relevant to the exclusion of certain activities with significant adverse effects on the climate, please refer to [climate-restrictions--exemptions-march-2022.pdf](#) ([danskebank.com](#)).

DATA SOURCES AND PROCESSING

In order to assess promotion of the environmental and/or social characteristics, the investment team managing the product and the underlying Danske Invest Product's leverages Danske Bank's ESG Data Platform for data and research on the characteristics. Danske Bank's ESG Data Platform consists of the following ESG data & research providers: CDP, ISS, MSCI, RepRisk, SASB, Sustainalytics, TruevalueLabs, Util, and Verisk Maplecroft.

The Responsible Investment team is responsible for continuously assessing the indicators to ensure that the data contained therein meets the needs of the investment teams and to address any identified issues with data quality. Any new indicators are subject to an assessment against our robust ESG Data Provider Assessment Framework, to maintain the quality of the data. Models are also whenever relevant subject to model validation. Currently, Danske Bank Asset Management estimates no data for any indicator on the platform.

LIMITATIONS TO METHODOLOGIES AND DATA

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

As corporate sustainability disclosures remains largely voluntary, far from all companies issue reports covering their management or approach to addressing the sustainability-related aspects of their activities. Moreover, there is a lack of consensus on the scope and format of reporting and as such, companies that do report do not disclose information in a standardised or easily comparable format. This creates, in certain instance, limitations in relations to the attainment of environmental or social characteristics of the Product. Furthermore, in a bid to support investors in their assessment of companies, a growing body of ESG data and rating agencies have emerged with their own proprietary scopes and methodologies, which in turn do not allow for comparisons to be made on environmental and/or social issues. In

addition, issues emerge across regions and asset classes, small cap and emerging markets in particular, with regards to comprehensive coverage and the availability of quality data.

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

DUE DILIGENCE

In addition to the outlined indicators, the investment teams review financial and sustainability information from multiple data sources (including but not limited to company reports and third-party investment research). Tools, knowledge, research, education and subject-matter expertise are provided to the investment team to support the due diligence processes. The strength of this bottom-up approach is a solid foundation of data, tools and resources that enables the investment teams to conduct due diligence and promote the environmental and/or social characteristics for the Product.

In addition, to the general principles on the integration of sustainability risks, the team will factor in material information to ensure that the attainment of the environmental and/or social characteristics. Sustainability-related aspects may then influence a decision to either buy or increase weighting, hold or maintain weighting, sell or decrease weighting, in order to promote the characteristics.

Sustainability related performance of companies or issuers and good governance practices are promoted through engagement with companies, collaboration with other investors and voting at general meetings. This enable the Products to address higher standards of corporate governance and sustainability within areas such as emissions, energy, biodiversity, water, waste, social and employee matters, human rights as well as anti-corruption.

Finally, screening and restrictions are used as a tool to identify companies that exhibit harmful environmental practices, by contributing, for example, to climate change, biodiversity loss or pollution, or companies that display inadequate social practices on human rights issues or labour standards.

Based on our assessment and company dialogue, we may from time to time decide to divest or restrict investments in a company, in a specific investment strategy or across multiple strategies in an effort to secure the attainment of the environmental and/or social characteristics.

ENGAGEMENT POLICIES

The investment teams engage on a regular basis with investee companies on material ESG matters to seek improvement in performance and processes in order to enhance and protect

the value of our investments.

Each investment team is responsible for outlining which key ESG issues to engage on and which standards companies are expected to adhere to. This can be done both in a preventive manner, or reactive to address issues that may have already occurred.

The investment teams can interact with companies in different ways (i.e. letters, emails, one-to-one meetings, conferences, site visits, etc.) and with preferred company representatives (e.g., board, chairman, CEO, Investor Relations, Sustainability).

The investment teams must be aware of the risk that they may have obtained insider knowledge. As such, the investment teams follow Danske Bank's Market Abuse Policy and Market Abuse Directive.

If an engagement is unsuccessful, the investment team can decide to escalate the engagement, or decide to either hold/maintain weighting, decrease weighting, or sell/divest.

For more information:

Policy for Active ownership:

https://www.danskeinvest.dk/docs/active_ownership_policy.pdf

DESIGNATED REFERENCE BENCHMARK

The Product does not use a reference benchmark to determine whether the Product attains the environmental and social characteristics that it promotes. As the Product does not apply a reference benchmark for such purposes the question is not further addressed.