Sustainability-related Website Disclosure

Danske Invest SICAV-SIF - Structured Credit - Non-Investment Grade
LEI code: 98450054C0CC3F6EA594

SUMMARY

You can read a summary of this document **here**.

NO SUSTAINABLE INVESTMENT OBJECTIVE

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

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The fund promotes environmental and/or social characteristics through:

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

The fund does not apply a reference benchmark for attaining its environmental or social characteristics.

INVESTMENT STRATEGY

You can read the latest investment strategy in the fund's prospectus.The investment strategy is focused on limiting negative externalities of investments of the fund by the integration of the fund's exclusions

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

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

Policies to assess good governance

The Responsible Investment Policy of Danske Invest Management A/S provides the basis for assessing and addressing the issuers' good governance practices. In accordance with the framework, the fund considers good governance practices through the use of exclusions tied to a good governance screening performed by the Responsible Investment team in Danske Bank.

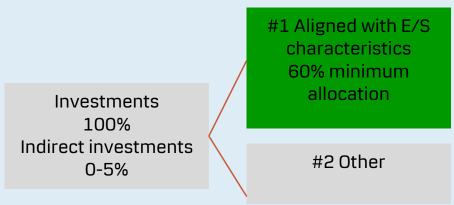
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance. The screening excludes issuers deemed to fail to comply with international governance principles following the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and International Labour Organization (ILO) Conventions. In order to safeguard the consideration for good governance practices, the screening further involves the use of defined criteria for sound management structures, employee relations, remuneration of staff and tax compliance. Failure to meet these criteria is seen as an indication of an overall lack of adherence to good governance criteria. Such issuers are therefore excluded from the fund.

For investments in the CLOs an assessment is also conducted of the issuer's policy for consideration of good governance practices, in order to ensure that this consideration is maintained in the management of the CLO and composition of the loan pool.

PROPORTION OF INVESTMENTS

The fund allocates minimum of 60% of its assets under management to the attainment of its environmental and/or social characteristics. The minimum allocation in this respect covers the share of investments screened for the purposes of the fund's environmental and social characteristics.

The 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.



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

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

MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

A number of processes are in place to monitor the promotion of environmental and/or social characteristics of the fund:

System monitoring through compliance engines

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

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

Monitoring by the Investment Organisation

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

First and Second Line Monitoring

Through spot-checking and detailed analyses of selected the fund's and characteristics, functions within the first and second line can challenge and monitor the extent to which the environmental and/or social characteristics are promoted.

METHODOLOGIES

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

Exclusions

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

The fund excludes in addition to exclusions on sustainability risks:

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

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

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

- issuers involved in controversial weapons.

All exclusions of the fund are defined by specific criteria and definitions set out in the Exclusion Instruction of Danske Invest Management A/S.

The Exclusion Instruction is available on the local website of Danske Invest Management A/S. On this webpage, you can also find links to the lists of excluded companies and issuers on the pages of the individual funds. You can find the list in two steps:
- select a fund under 'Our funds' on your local Danske Invest Management A/S webpage
- scroll down and click the link under 'Exclusions in the fund'.

For the enhanced sustainability standards screening capturing conduct and activities harmful to society further reference is made to the methodology descriptions in the document “Enhanced Sustainability Standards Screening” available at:
https://danskebank.com/sustainability/publications-and-policies/sustainability-related-disclosures

DATA SOURCES AND PROCESSING

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

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

Given the amount of sustainability data points that are factored in, it is not possible to give one clear answer to the proportion of data that is estimated as it varies significantly between data points. Some data, e.g. from CDP, is based fully on company disclosure whereas data points such as e.g. Scope 3 emissions, are based heavily on extensive estimations. Overall, most of the data is based on estimations or model assumptions.

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

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

LIMITATIONS TO METHODOLOGIES AND DATA

The ESG data landscape is characterized by a lack of consistent methodologies and limited transparency on how scores, indicators ratings are calculated for issuers. Sustainability-related data, information, and assessments are not comparable to that of financial information. This implies a risk of misrepresentation of data on sustainability-dimensions or impacts associated with an investment. These limitations in data are due to a number of factors, not in the least being that they are, in part, a reflection of how sustainability data is produced.

No universally accepted (legal, regulatory, or others) framework currently exists in relation to sustainability related data, information, and assessments.

Where primary reported data and information are not available, best efforts are made to obtain data, including data estimates, information, and assessments through third-party providers or directly from investee companies, and/or by carrying out additional research or making reasonable assumptions or estimations.

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

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

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

DUE DILIGENCE

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

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

DESIGNATED REFERENCE BENCHMARK

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

Versions