

Bankinvest Global Responsible Equities

SFDR product category: Article 8

Summary

The Sub-fund's portfolio is invested with the intention of promoting the environmental and social characteristics by applying exclusions, ESG integration and active ownership. While the Sub-Fund does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments. The Sub-Fund uses a combination of strategies to attain these goals. Specifically, it employs a blanket ban on certain activities, sectors, and practices that it deems as incompatible while it also utilizes a norm-based screening to filter out companies that violate international norms and don't exhibit any willingness to change. More detailed information is provided below.

No sustainable investment objective

This Sub-Fund promotes E/S characteristics but does not have as its objective sustainable investment.

While the Sub-Fund does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments.

Environmental or social characteristics of the financial product

The Sub-fund's portfolio is invested with the intention of promoting the environmental and social characteristics by applying exclusions, ESG integration and active ownership.

Exclusion and ESG-integration:

The Sub-Fund exclude companies with a significant exposure to activities considered to have a significantly negative impact on the environment or society. The Sub-Fund invests in companies that have been analyzed and assessed based on ESG factors. ESG factors can be used to identify sustainability risks and opportunities. Only companies that meet the minimum requirements for ESG rating can be included. Similarly, the overall ESG rating at sub-fund level must be at a high level. Minimum share of sustainable investments:

The Sub-Fund partly invests in sustainable investments. This means that the Sub-Fund invests in companies that are assessed to contribute significantly to environmental or social goals without causing substantial harm to other environmental or social goals.

Active ownership:

The Sub-Fund seeks to influence the companies' and issuers' management of sustainability issues through active ownership in relation to substantial sustainability topics, where relevant.

Carbon emissions:

The Sub-Fund focuses on companies' CO2 emissions and seek to reduce the carbon footprint of the Sub-Fund's investments.

Details on how these E/S characteristics are attained can be found further along this document.

Lastly, no reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

Investment strategy

The environmental and social characteristics are met by the Sub-Fund being subject to the investment manager's general policy for responsible investments. It is continuously monitored that the Sub-Fund complies with the restrictions imposed by the policy and the Sub-Fund's investment universe.

The investment manager has a policy of active ownership and exercise of voting rights. This means that the investment manager acts as an active owner of the companies in which the Sub-Fund invests. Active ownership covers both ongoing dialogue with the companies and voting at the companies' general meetings, where environmental, social and governance issues may be included.

The policies can be accessed here: <https://bankinvest.com/>

For information on the Sub-Fund's overall investment strategy, please refer to the relevant section of the prospectus.

Proportion of investments

| Proportion of investments | % of assets |
|--|-------------|
| Investments aligned with the fund's E/S characteristics | Min. 85% |
| Qualifying as sustainable investments | Min. 40% |
| under the EU Taxonomy | — |
| with a social objective | Min. 1% |
| Not qualifying as sustainable investments but having other E/S characteristics | Min. 60% |
| Other investments¹ | Max. 15% |

¹ 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

Exclusion and ESG-integration:

To measure the achievement of the environmental and social characteristics promoted, the investment manager uses a range of climate, environmental, social, and governance-related indicators such as CO2, ESG rating, UN Sustainable Development Goals, norms-based screening and exposure to coal, oil sands, Arctic drilling, tobacco, and weapons.

Minimum share of sustainable investments:

The share of sustainable investments is utilized as an indicator of the degree of sustainability in the fund.

Active ownership:

Information about the investment manager's voting behavior is used as an indicator of whether the characteristics of active ownership are achieved.

Carbon emissions:

The total carbon footprint of the Sub-Fund is used as an indicator.

BankInvest has an internal Responsible Investment Committee, which is tasked with monitoring the Investment Manager's responsible investment efforts, including among others developing policies and maintaining an exclusion list.

The Committee also approves the Policy for Responsible Investments. The policy sets the framework for exclusion criteria, the process for norm-based screening, and ESG integration. The fund's adherence to this policy helps ensure the fulfilment of the environmental and social characteristics that the fund aims to promote.

Based on the policy, compliance rules have also been established to ensure adherence to the policy's standards. This results in continuous monitoring and control of the fund's adherence to these characteristics.

Furthermore, the exclusion list is analysed and reassessed twice a year, where the fund's positions are evaluated for compliance with human rights, labour rights, environmental conventions and principles, and anti-corruption and anti-money laundering principles. The Investment Manager will seek to divest in companies entering the exclusion list as soon as possible.

Methodologies

Based on ESG data, the investments within the sub-fund are screened with regards to product involvement, norm-based breaches and engagement status resulting in an exclusion list.

Data sources and processing

The Investment Manager is using ESG data from globally recognized ESG data providers including MSCI ESG and Morningstar Sustainalytics.

Data is sourced directly into our portfolio management system, BlackRock/Aladdin. And pre-trade limits are implemented.

Limitations of methodologies and data

The landscape of sustainability data is quite large and potentially a lack of consistency is present.

When applying data from an external data provider we accept their methods and models.

The fact that corporate disclosures within sustainability is still largely voluntary, can often lead to data scarcity. Consequently, parts of the available data are based on estimations, introducing a risk of inaccuracy of the information upon which the external data providers rely.

The use of external data providers in turn implies that the application of different methodologies for each data provider could potentially lead to a degree of uninformed investment decisions being undertaken based on the incoherent methodologies between the different data sources.

Various measures are taken to ensure that these limitations are mitigated. In general, a best-effort approach is applied, and a dialogue is conducted with the external data providers, both on a continuous basis regarding methodologies as well as on an ad-hoc basis if a discrepancy is identified.

Due diligence

The compliance system setup is automated and pre-trade controls are automatically run every time a new investment is made.

BankInvest has a four-eyes principle when setting up any limits within our portfolio management system, BlackRock/Aladdin.

It is not possible to execute a trade if the ISIN is on the exclusion list.

Engagement policies

BankInvest has a policy for active ownership and exercising voting rights. This means that the investment manager for the fund acts as an active owner of the companies invested in. Active ownership includes ongoing dialogue with and voting at the companies' general meetings, where environmental, social, and governance issues may be addressed.

The policy can be accessed here: [Politik for Aktivt ejerskab \(bankinvest.com\)](https://www.bankinvest.com/politik-for-aktivt-ejerskab)

Designated reference benchmark

The Sub-Fund does not use a benchmark to evaluate its overall ESG profile.