

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Legal entity identifier:

**DPAM B - EQUITIES EUROLAND** 

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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 include 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	• X No					
It will make a minimum of sustainable investments with an environmental 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 0.00% of sustainable investments					
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	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	with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy					
	with a social objective					
It will make a minimum of sustainable investments 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?

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The Sub-fund promotes environmental and social characteristics through a rigorous methodology aimed at:

- defending fundamental rights (human rights, labour law, prevention of corruption and environmental protection).
- not funding controversial activities and behaviour that could affect the long-term reputation of the investments.
- promoting environmental, social and governance (ESG) best practices.
- What Sustainability Indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

The sustainability indicators used to measure the achievement of all environmental and social characteristics promoted by the Sub-fund correspond to the binding investment restrictions:

- a. Zero exposure to companies deemed to be non-compliant with global standards;
- b. Zero exposure to companies involved in controversial activities according to the definitions and thresholds stipulated by DPAM's Controversial Activities Policy (available at https://www.dpaminvestments.com/documents/controversial-activity-policy-enBE (Controversial Activities Policy)); and
- c. Zero exposure to companies facing the most severe ESG controversies.

as detailed in the section below entitled "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?"

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?

Not applicable. This Sub-fund does not seek to make sustainable investments.

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?

Not applicable. This Sub-fund does not seek to make sustainable investments.

— How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable. This Sub-fund does not seek to make sustainable investments.

— How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not applicable. This Sub-fund does not seek to make sustainable investments.

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 factors relating to environmental, social and employee matters, respect for human rights, anti - corruption and anti - bribery matters.

Principal adverse impacts

are the most significant

investment decisions on

negative impacts of

## TU.

## Does this financial product consider principal adverse impacts on sustainability factors?

X

Yes,

Yes, the Sub-fund considers all the principal adverse impact indicators on sustainability factors (hereinafter "PAIs") listed in Table 1 of Appendix I of the Delegated Regulation (EU) 2022/1288.

The PAIs are intrinsically linked to DPAM's commitment to reduce the negative impact of the Sub-fund's investments by avoiding activities or behaviours that may significantly undermine sustainable and inclusive growth. This commitment is embedded throughout the research and investment process from its inception.

In concrete terms, PAIs are incorporated into the various stages of upstream portfolio construction via exclusions and the resulting eligible universe (i), and through the investment process via fundamental analysis, controversy monitoring and ongoing dialogue with investees (ii):

- 1) Firstly, with regard to environmental PAIs:
- a) they are analysed and monitored at the level of the investee issuers, particularly with regard to PAIs related to greenhouse gas emissions and energy performance, including through research of DPAMs in the context of the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD).
- b) after that, the Global Standards compliance filter includes a filter on environmental protection.
- c) In addition, the screening and analysis based on the main ESG controversies in which companies may be involved also includes controversies related to environmental issues, such as the environmental impact of company operations (emissions, waste, energy use, biodiversity and water consumption), the environmental impact on the supply chain and the impact of products and services (carbon and environmental impact).
- 2) Secondly, social PAIs are systematically analysed throughout the research and investment process:
- a) the Global Standards compliance filter is structured around human rights, labour rights and the prevention of corruption.
- b) the exclusion filter for companies involved in controversial activities (definitions and thresholds according to DPAM's Controversial Activities Policy) (accessible via the link https://www.dpaminvestments.com/documents/controversial-activity-policy-enBE (Controversial Activities Policy)).
- c) In addition, the screening and analysis based on the main ESG controversies in which companies may be involved also includes controversies related to social issues, i.e. society and community, customer and employee, and controversies related to governance issues such as business ethics, including corruption and bribery.

DPAM's approach and processes are further described in its Sustainable and Responsible Investments Policy and in the TCFD report available via the links https://www.dpaminvestments.com/documents/sustainable-and-responsible-investments-policies-enBE (Sustainable and Responsible Investments Policy) and https://www.dpaminvestments.com/documents/tcfd-report-enBE (TCFD Report).

Information on the PAIs taken into consideration by the Sub-fund will be available in the annual report of DPAM B, the SICAV to which the Sub-fund belongs.

No



#### What investment strategy does this financial product follow?

The Portfolio promotes environmental and social characteristics through exclusions, fundamental research, voting and engaged dialogue according to the following scheme of portfolio construction steps as schematized at the end of the section.

A more general description of the Sub-fund's investment strategy can be found in the individual Sub-fund factsheet in the SICAV's prospectus.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

ESG INTEGRATION	ACTIVE OWNERSHIP	BASIC NEGATIVE SCREENING	NORMATIVE & NEGATIVE SCREENING
Inclusion in investment decisions (PAI)	Influencing behaviour	Exclusions based on activity	Compliance with global standards/ Exclusion of severe controversial behaviour (Min. social & gov. safeguards)
<del></del>		ARTICL	E 8

#### 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?

The binding investment restrictions apply to (a) companies that do not comply with the principles of the Global Standards described below, (b) companies involved in controversial activities, and (c) companies involved in ESG controversies of maximum severity:

- a) Compliance of the portfolio with Global Standards: The Sub-fund does not invest in companies that do not comply with the 10 principles of the Global Compact and the United Nations Guiding Principles, ILO instruments, OECD Guidelines for Multinational Enterprises and the underlying conventions and treaties.
- b) Exclusion of companies involved in controversial activities: The Sub-fund excludes securities whose business is the manufacture, use or possession of anti-personnel mines, cluster munitions, depleted uranium ammunition and armour, chemical or biological weapons. The Sub-fund also excludes securities of companies which have material exposure to the production or distribution of tobacco or raw materials and equipment for the production of tobacco, the mining of thermal coal, or the generation of electricity from coal.

These exclusions and their thresholds are detailed in DPAM's Controversial Activities Policy (section on "conventional" strategies) which are accessible via the link https://www.dpaminvestments.com/documents/controversial-activity-policy-enBE (Controversial Activities Policy).

c) Portfolio exposure to ESG controversies of maximum severity: companies involved in ESG controversies of maximum severity are not eligible for investment.

Exclusion lists of individual companies excluded under criteria (a), (b) and (c) above are regularly updated and feed into the portfolio investment monitoring systems.

Security exclusions based on the binding criteria of the investment strategy apply both at the time of purchase of a position and during the holding of the position in the portfolio.

At each data series collection, DPAM establishes exclusion lists which are updated at least quarterly and on an ad hoc basis in case of position deterioration. There is one exclusion list per constraint and per strategy group, with DPAM applying a similar exclusion/restriction threshold. DPAM's risk management department is responsible for applying the necessary prevention (ex-ante risk) and control (ex-post risk) mechanisms to effectively enforce the exclusion lists in the investment portfolios of DPAM's strategies.

DPAM uses ESG research from extra-financial rating agencies to assess the severity of controversies to which companies are exposed and excludes the most severe controversies. DPAM also produces internal analyses of ESG controversies to which companies are exposed. DPAM reserves the right to exclude companies that it considers to be involved in sufficiently serious controversies.

In the event of a deterioration in the ESG profile of a company leading to its downgrading to Global Standards status or the emergence of a controversy of maximum severity regarding the company, the manager will sell the relevant investment in the interests of the Sub-fund's shareholders within three months.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

not applicable

## What is the policy to assess good governance practices of the investee companies?

Good governance criteria are an integral part of DPAM's active ownership, engagement and sustainable and responsible investment policies and are included in the investment decision process through the different steps described in the section "What are the binding elements of the investment strategy used to select investments to achieve each of the environmental or social characteristics promoted by this financial product?" above. DPAM takes these criteria into account in the following ways:

- i. Portfolio compliance with Global Standards: Prevention of corruption is one of the four main themes of the 10 principles of the UN Global Compact.
- ii. Portfolio exposure to ESG controversies of maximum severity: Good governance criteria (business ethics, political lobbying, corporate governance, corruption and accountability of governance bodies on ESG aspects) are the subject of the analysis of controversies, their severity and corrective measures.
- iii. Qualitative ESG approach: DPAM's fundamental research is largely devoted to corporate governance and governance issues.
- iv. DPAM's voting policy helps to promote good corporate governance practices (separation of powers, independence and adequacy of the board of directors, respect for minority shareholders' rights, quality of internal and external audit, etc.). DPAM's engagement policy is linked to this voting policy and applies its principles.

Governance issues are also an integral part of the monitoring of investments, notably through DPAM's voting policy and engagement policy, which can be accessed via the links https://www.dpaminvestments.com/documents/dpam-voting-policy-enBE (Voting Policy) and https://www.dpaminvestments.com/documents/engagement-policy-enBE (Engagement Policy).



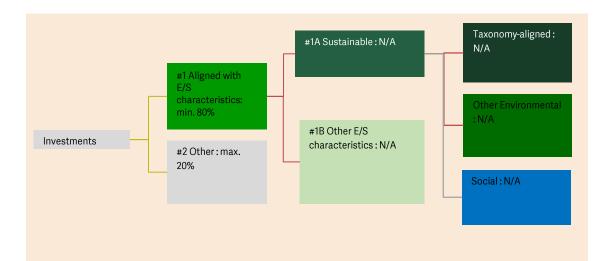
#### What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

By applying the investment strategy described above, the Sub-fund invests a minimum of 80% of its assets in securities that meet the environmental and social characteristics it promotes (in the table referred to as "#1 Aligned with E/S characteristics").

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?

Derivative products, if any, used to achieve the investment objectives will not be used to promote the environmental and/or social aspects.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

This Sub-fund does not seek to make sustainable investments and makes no commitment to align its investments with the European taxonomy.

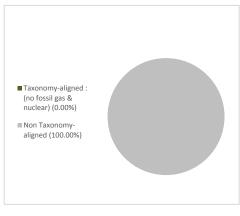
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

Yes		
	In fossil gas	In nuclear energy
No		

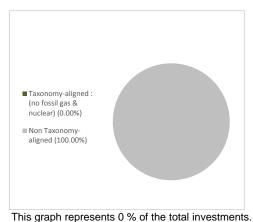
<sup>&</sup>lt;sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full 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.

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?

This Sub-fund does not seek to make sustainable investments or invest in enabling and/or transitional activities.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

This Sub-fund does not seek to make sustainable investments or sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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.

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?

This Sub-fund does not seek to make sustainable investments or sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



## What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

Binding ESG screenings carried out in accordance with the investment strategy described above are applied to the entire Sub-fund, excluding:

- Liquidity
- Derivative instruments
- Collective investment undertakings
- Issuers that do not report sufficient information or are insufficiently covered by ESG research to judge their environmental and/or social characteristics.

The Sub-fund may invest or hold these types of assets in order to achieve its investment objectives, for portfolio diversification, liquidity management and for risk hedging purposes. The remaining proportion will not exceed 20% of the Sub-fund.

There are no minimum environmental or social guarantees.



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?

N/A

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?
N/A

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

N/A

- How does the designated index differ from a relevant broad market index?
  N/A
- Where can the methodology used for the calculation of the designated index be found?

N/A



#### Where can I find more product specific information online?

More product-specific information can be found on the website: https://www.funds.dpaminvestments.com/funds.html (Fund/Sub-fund/Share class/"Sustainability transparency" tab).