

Brussels, 6.4.2022
C(2022) 1931 final

ANNEX 2

ANNEX

to the

Commission Delegated Regulation (EU) .../....

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

Template 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

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.

Product name: Maj Invest Vækstaktier

Legal entity identifier: 549300CCWXLVJ2O1GZ52

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 ____% 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?

Afdelingen fremmer miljømæssige og sociale karakteristika ved at integrere ESG-risici og -muligheder i investeringsprocessen. Afdelingen sigter mod at investere i de selskaber, der bedst håndterer ESG-risici og -muligheder inden for afdelingens investeringsunivers. Det vurderes at selskaber, der aktivt adresserer disse risici, kan opnå en konkurrencemæssig fordel på sigt. Det vurderes desuden at bedre generel ESG-performance i selskaberne bidrager til at fremme miljømæssige og sociale karakteristika.

Der gives ikke tilsagn til bæredygtige investeringer som defineret i EU-forordningen, Sustainable Finance Disclosure Regulation (SFDR).

Der anvendes ikke et referencebenchmark til at opnå de miljømæssige eller sociale karakteristika, som afdelingen fremmer.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

Opnåelsen af afdelingens miljømæssige og sociale karakteristika måles gennem nedenstående indikatorer:

Karakteristika	Indikator	Beskrivelse
Bidrag til sociale og miljømæssige karakteristika	▪ Porteføljens aggregerede ESG Risk Rating	Afdelingen anvender Sustainalytics' ESG Risk Rating, som måler selskabernes eksponering over for og håndtering af ESG-risici. Selskaber med en lavere rating har færre uhåndterede risici og formår derfor bedre at integrere ESG-risici og -muligheder i deres drift. Ubetydelig (0–9.9): Minimal uhåndterede ESG-risici, hvilket indikerer stærk håndtering af væsentlige ESG-risici. Lav (10–19.9 rating) Få uhåndterede ESG-risici, hvilket indikerer et højt niveau af ESG-integration. Middel (20–29.9 rating): Moderate uhåndterede ESG-risici, hvilket indikerer et middel niveau af ESG-integration. Høj (30–39.9 rating): Høje uhåndterede ESG-risici, hvilket indikerer et lavt niveau af ESG-integration. Alvorlig (40 og derover): Alvorlige uhåndterede ESG-risici, hvilket indikerer kritiske mangler i håndteringen af væsentlige ESG-risici.
Bidrag til sociale og miljømæssige karakteristika	▪ MSCI World Growths aggregerede ESG Risk Rating	Afdelingen anvender MSCI World Growths samlede ESG Risk Rating til at sammenligne afdelingens selskabers præstation i forhold til et relevant benchmark. Afdelingen anvender Sustainalytics ESG Risk Rating, som måler selskabernes eksponering samt håndtering af ESG-risici. Selskaber med en lavere rating er bedre til at integrere ESG-risici og -muligheder i selskabsdriften. Se rating beskrivelse ovenfor

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

Bidrag til sociale og miljømæssige karakteristika	Forskellen mellem porteføljens og MSCI World Growths aggregerede ESG Risk Rating	Afdelingen måler den samlede ESG-performance ved at sammenligne porteføljens og benchmarkets aggregerede ESG Risk Ratings. Afdelingen sigter mod at opnå en ESG Risk Rating, der er lavere end benchmark.
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- ***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?***

Ikke relevant.

- ***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?***

Ikke relevant.

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.

- — — *How have the indicators for adverse impacts on sustainability factors been taken into account?*
- — — *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Ikke relevant.

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, _____

No

Afdelingen tager hensyn til de væsentligste negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer, herunder PAI-indikatorer, der er angivet i Tabel 1 i Bilag I under EU's reguleringsmæssige tekniske standarder (RTS'er), samt udvalgte indikatorer fra Tabel 2 og 3.

Udvalgte indikatorer fra tabel 2: Klimarelaterede og andre miljørelaterede indikatorer

Negativ bæredygtighedseffekt	Negativ indvirkning på bæredygtighedsfaktorer (SFDR PAI)	Enhed
Drivhusgasemissioner	4. Investeringer i selskaber uden initiativer til reduktion af CO ₂ -emissioner	Andel af investeringer i investeringsmodtagende selskaber uden initiativer til reduktion af CO ₂ -emissioner med henblik på tilpasning til Parisaftalen

Udvalgte indikatorer fra tabel 3: Sociale og personalemæssige spørgsmål samt respekt for menneskerettighederne og bekæmpelse af korruption og bestikkelse

Negativ bæredygtighedseffekt	Negativ indvirkning på bæredygtighedsfaktorer (SFDR PAI)	Enhed
Menneskerettigheder	9. Manglende menneskerettighedspolitik	Andel af investeringer i enheder uden en menneskerettighedspolitik

Information vedrørende negative indvirkninger på bæredygtighedsfaktorer vil blive offentliggjort i Investeringsforeningen Maj Invest årsrapport:

<https://majinvest.dk/kontakt-og-information/%C3%A5rsrapporter-og-halvaarsrapporter>

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

What investment strategy does this financial product follow?

Maj Invest Vækstaktier investerer i selskaber, der vokser hurtigere end markedet generelt. Afdelingen investerer globalt og med en forholdsvis fokuseret portefølje på 25-35 aktier. Der må derfor forventes større udsving end i traditionelle globale aktieafdelinger. Målsætningen for Maj

Invest Vækstaktier er over tid at skabe et merafkast i forhold til den generelle udvikling på det globale aktiemarked.

Foreningens investeringsrådgiver, Fondsmæglerselskabet Maj Invest har under sit ESG Investment Framework defineret fire ESG-investeringsstrategier. ESG-integrationsstrategien følger en systematisk tilgang, hvor ESG-faktorer indgår på forskellige stadier i investeringsprocessen. Integration af ESG er ikke nødvendigvis i konflikt med økonomisk performance; tværtimod kan selskaber, der håndterer ESG-risici og -muligheder, have potentiale til at præstere bedre på lang sigt.

På grund af afdelingens miljømæssige og sociale karakteristika, samt fokus på globale selskaber, forventes bæredygtighedsrisici at have en lav indvirkning på afdelingens afkast. Dette skyldes at store globale selskaber, der integrerer ESG-risici og -muligheder generelt har en højere ESG-performance, samt øget transparens.

● ***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?***

Afdelingen anvender eksklusion, ESG-integration og aktivt ejerskab som bindende elementer i udvælgelsen af investeringer til at opnå de miljømæssige eller sociale karakteristika, denne afdeling fremmer.

Eksklusioner:

- Afdelingen ekskluderer:
 - selskaber indenfor udforskning, produktion, distribution og opbevaring af olie og gas.
 - selskaber indenfor udforskning og udvinding af tjæresand.
 - selskaber indenfor udforskning og udvinding af termisk kul.
 - selskaber indenfor produktion af tobaksprodukter.
 - selskaber indenfor produktion af tobaksrelaterede produkter.
 - selskaber med mere end 5 pct. af omsætningen indenfor distribution af tobaksprodukter.
 - selskaber med mere end 5 pct. af omsætningen indenfor produktion af våben til militært brug, samt systemer og komponenter til militære våben.
 - selskaber med mere end 5 pct. af omsætningen indenfor ejerskab eller drift af gambling-etablissemeter.
 - selskaber med mere end 10 pct. af omsætningen indenfor produktion af voksenunderholdning.
 - selskaber med mere end 10 pct. af omsætningen indenfor distribution af voksenunderholdning.
 - selskaber involveret i hvid fosfor eller forarmet uran

- selskaber, der er involveret i aktiviteter med tilknytning til kontroversielle våben (som omtalt i internationale traktater og konventioner).
- selskaber, der har overtrådt internationale standarder som UN Global Compact og OECD's retningslinjer, som ikke har vist vilje til at ændre deres adfærd trods gentagne engagement processer, og dermed placeres på Sustainalytics disengageliste.

ESG-integration

- Selskaber vurderes på deres eksponering over for ESG-risici og effektiviteten af deres risikohåndtering på tværs af 22 væsentlige emner og mere end 40 indikatorer.
- Derudover vurderes negative indvirkninger på bæredygtighedsfaktorer ud fra 16 PAI-indikatorer på tværs af miljømæssige og sociale faktorer.

Aktivt ejerskab

- Der indledes dialog med selskaber med høje ESG-risici og kontroverser. Dette kan gøres gennem direkte dialog, Sustainalytics eller samarbejde med investorer for at øge bevidstheden om ESG-risici, fremme risikoreducerende tiltag og følge fremskridt.

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

Ikke relevant.

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

Der foretages en normbaseret screening af alle investeringer i afdelingen i samarbejde med Sustainalytics og baseret på data modtaget fra Sustainalytics. Screening skal sikre, at selskaberne i porteføljen overholder internationale normer, herunder UN Global Compact og OECD Guidelines for multinational enterprises.

Hvis screeningen på grundlag af data fra Sustainalytics identificerer at et af selskaberne i porteføljen udviser mistanke om brud eller et bekræftet brud på internationale normer, indleder Sustainalytics engagement med selskabet på vegne af foreningens investeringsrådgiver, Fondsmæglerselskabet Maj Invest, og andre institutionelle investorer. Hvis langvarig dialog ikke fører til, at selskabet ændrer adfærd eller viser vilje hertil, kommer selskabet på Sustainalytics' disengage-liste og dermed på eksklusionslisten, og selskabet vil som udgangspunkt blive solgt fra porteføljen.

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.



What is the asset allocation planned for this financial product?

Alle afdelingens investeringer opfylder kriterierne for foreningens investeringsrådgiver, Fondsmæglerselskabet Maj Invest ESG-integrationsstrategi og er i overensstemmelse med andre M/S karakteristika. Dette bliver opfyldt gennem de bindende elementer i investeringsprocessen, der omfatter eksklusioner, ESG-integration og aktivt ejerskab, som er beskrevet ovenfor.

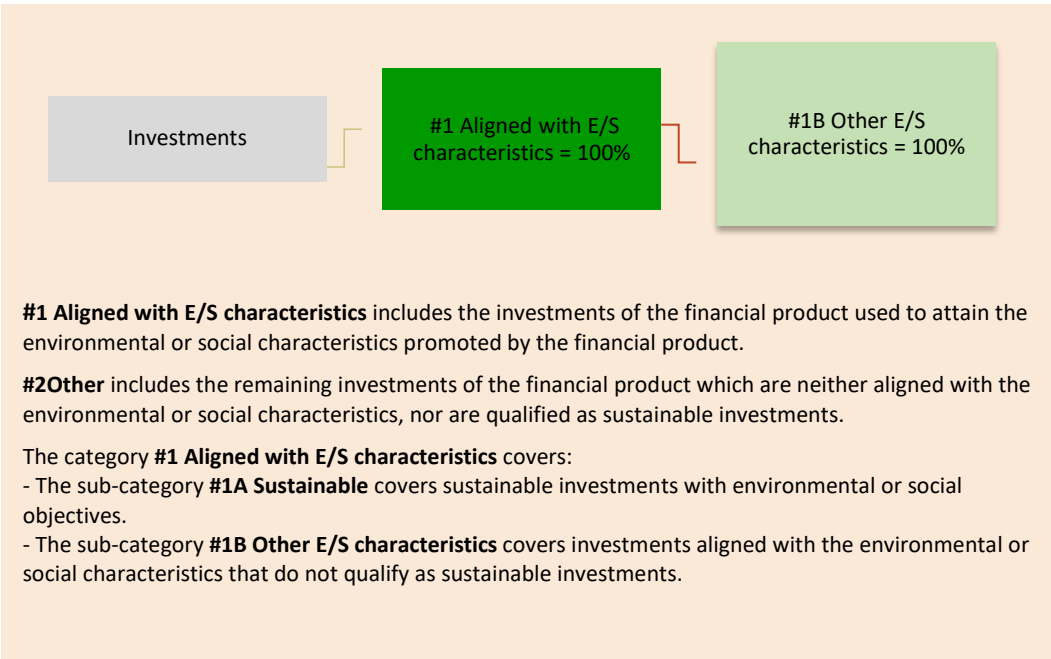
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

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.

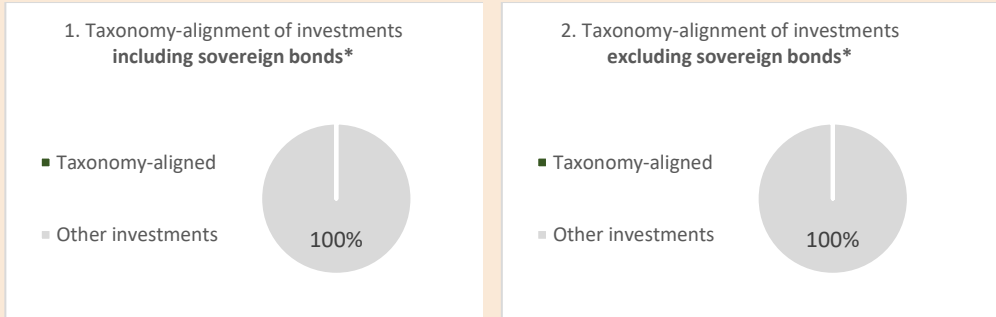


● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**
Ikke relevant



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

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?**
Ikke relevant.



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

Ikke relevant



What is the minimum share of socially sustainable investments?

Ikke relevant



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

Ikke relevant



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?

Nej.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Ikke relevant

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

Ikke relevant

- *How does the designated index differ from a relevant broad market index?*

Ikke relevant

- *Where can the methodology used for the calculation of the designated index be found?*

Ikke relevant



Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://majinvest.dk/om-maj-invest/etik-ansvarlighed-og-oevrige-politikker/>

<https://majinvest.dk/vores-afdelinger/alle-afdelinger/>

<https://majinvest.com/om-maj-invest/information/juridisk-information/>

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