ANNEX III

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:

DPAM L Bonds EUR Quality Sustainable

Legal entity identifier: 5493000Q6B37KU220573

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.

Sustainable investment objective

Sustainable investment objective	
•• Xes	• 🗌 No
 It will make a minimum of sustainable investments with an environmental objective:25% 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 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 will make a minimum of sustainable investments with a social objective:25%	It promotes E/S characteristics, but will not make any sustainable investments



Les **indicateurs de durabilité** permettent de mesurer la manière dont les objectifs de durabilité de ce produit financier sont atteints.

What is the sustainable investment objective of this financial product?

The Sub-fund has a sustainable investment objective.

The Sub-fund aims to invest in companies that contribute through their products and services to the 17 Sustainable Development Goals (SDGs) defined by the United Nations, and to advance companies on their contribution to sustainable development and environmental, social and governance (ESG) issues.

The investment universe is narrowed: the portfolio focuses on companies with a net positive contribution (as defined below), i.e. (1) whose core business is the development of products and services that contribute to the achievement of sustainable development goals (SDG) and (2) the most advanced in terms of sustainability and ESG risk engagement.

Some of the environmental objectives pursued by the Sub-fund contribute to climate change mitigation and adaptation as defined by Regulation (EU) 2019/2088.

The Sub-fund has not designated a benchmark to achieve its sustainable investment objective within the meaning of Article 9 of Regulation (EU) 2019/2088

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

In order to attain its investment objective, the Sub-fund aims to achieve:

- a minimum of 80% of recognised impact issues (green bonds and equivalents) or issuers meeting environmental or social Sustainable Development Goals (SDGs) i.e.:
 - companies aligned with one of the first two objectives of the EU taxonomy (climate change mitigation and adaptation);
 - companies aiming to make a net positive contribution to environmental sustainability objectives;
 - companies aiming to make a net positive contribution to social sustainability objectives.

- In addition, in order to enhance the contribution to the financing of the 17 sustainable objectives defined by the United Nations (UN) as a whole and the principle of not causing significant harm to an environmental (under the EU Taxonomy or not) and/or social investment objective, the sub-fund also targets:

- a minimum of 50% of issuers making a positive net contribution* to all the SDGs (min. 50% of the sub-fund's AUM is invested in recognised sustainable bonds (green bonds or equivalent) or issuers that individually make a positive contribution to all 17 SDGs on a net contribution basis) and
- a positive net contribution at the level of the overall portfolio to the SDGs, i.e. the impact result based on a weighted average over all invested issuers at the level of the overall portfolio and in terms of net contribution to all 17 SDGs is positive.

*The net positive contribution is the difference between the positive and negative impact contributions and is calculated at the level of the invested company and the overall portfolio. Based on the UN SDG framework, the impact contribution takes into account both (1) the extent to which the products and services of the invested company contribute to the achievement of the SDGs and (2) the negative impacts associated with their activities along the value chain. The other sustainability indicators used to measure the attainment of the Sub-fund's sustainability objective correspond to the binding investment restrictions in terms of exposure of the investee companies to certain controversial activities and behaviours:

- a) Zero exposure to issuers deemed to be non-compliant with Global Standards;
- b) Zero exposure to issuers involved in controversial activities as defined by the Manager's Controversial Activities Policy (available at www.dpamfunds.com (Controversial Activities Policy));
- c) Zero exposure to issuers facing ESG controversies of maximum severity;
- d) Alignment with the Science Based Targets initiative (SBTi) or equivalent: the Sub-fund intends to have an exposure (excluding liquidity) above its benchmark;
- e) A better weighted average ESG profile than its benchmark prior to the application of the sustainable investment selection methodology, over a rolling three-year period;

for more details, see the section below "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The Manager ensures that the Sub-fund's sustainable investments do not materially undermine an environmentally or socially sustainable investment objective by:

Issuer level:

- Consideration of the main negative impacts on the mandatory sustainability factors (hereinafter "PAIs") listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 which allows for the reduction of the negative impacts of the investment, including:
 - a) by incorporating several elements to avoid and/or reduce its exposure to activities or behaviours that could affect another environmental or social objective (such as the Global Standards compliance filter and the exclusion of ESG controversies of maximum severity or activities most harmful to other environmental and/or social objectives)
 - b) via an engagement process with investee companies, in accordance with its Engagement Policy, which is available at: www.dpamfunds.com (Engagement Policy)
- An impact calculation methodology which takes into account the positive and negative contribution of the company's products and services to the Sustainable Development Goals (SDGs) in order to optimise the net positive (resulting) contribution.

Overall portfolio level:

- A rule of minimum 50% of assets aligned with the EU Taxonomy or making positive contribution on all 17 SDGs.

It should be noted that the Manager's Controversial Activities Policy is intended to describe and explain the Manager's choices in terms of exclusions and restrictions on investments in corporate or state activities or behaviour deemed unethical and/or irresponsible and/or unsustainable. It is available at https://res.cloudinary.com/degroof-petercam-asset-

management/image/upload/v1614006839/DPAM_policy_Controversial_activities.pdf.

The Science-Based Targets (SBT) initiative is a partnership between CDP, the UN Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). The initiative (1) identifies and promotes best practice emissions reduction and net zero targets in alignment with climate science, (2) provides technical assistance and expert resources to companies that set science-based targets in alignment with the latest climate science, (3) assembles a team of experts to provide companies with independent assessment and validation of targets.

Issuers/companies are called on to join the initiative and define a clear programme on their emission reduction strategy and net zero targets aligned with the Paris Agreement.

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

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

In concrete terms, PAIs are incorporated into the various stages of upstream Sub-fund 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 the Manager's research 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);
- d) Similarly, environmental indicators are included in the analysis of the ESG profile of companies and impact their best-in-class ranking;
- 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 (in accordance with the Manager's Controversial Activities Policy available at www.dpamfunds.com (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;
- d) Similarly, social indicators are included in the analysis of the ESG profile of companies and impact their best-in-class ranking.

The Manager's approach and processes are further described in its Sustainable and Responsible Investments Policy and in the TCFD report, which are available at www.dpamfunds.com.

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

The Manager's sustainable and responsible investment policies are based on global standards, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (Guiding Principles). These standards are also an integral part of the benchmarks used by the various rating agencies that the Manager uses.

The first step in the Sub-fund's investment process is a normative screening against these Global Standards: companies that are not in compliance are excluded from the eligible investment universe.



🗙 Yes

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

the Sub-fund takes into account all the PAIs on sustainability factors listed in Table 1 of Annex I of Delegated Regulation (EU) 2022/1288.

The PAIs are intrinsically linked to the Manager's commitment to reduce the negative impact of the Subfund's investments by avoiding activities or behaviours that may significantly hinder sustainable and inclusive growth. This commitment is incorporated throughout the research and investment process from its inception.

In concrete terms, PAIs are incorporated into the various stages of upstream Sub-fund 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 the Manager's research 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).
 - d) Similarly, environmental indicators are included in the analysis of the ESG profile of companies and impact their best-in-class ranking.
- 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 (in accordance with the Manager's Controversial Activities Policy available at www.dpamfunds.com (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.
 - similarly, social indicators are included in the analysis of the ESG profile of companies and impact their best-in-class ranking. The Manager's approach and processes are further described in its Sustainable and Responsible Investments Policy and in the TCFD report, which are available at www.dpamfunds.com.

Information on the main negative impacts on sustainability factors will be available in the annual report of DPAM L, the SICAV to which the Sub-fund belongs.

___ No



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

What investment strategy does this financial product follow?

The sub-fund mainly invests in euro-denominated corporate bonds with a high rating (investment grade). In the active management of the Sub-fund, the Manager selects securities with the potential for an advantageous return in relation to the risk incurred on the basis of criteria that are both financial and related to sustainable development (such as, for example, respect for the environment or socially equitable governance). The Sub-fund is actively managed. The Sub-fund may use derivatives to exploit or hedge against market fluctuations, or for efficient portfolio management.

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The sustainable investment objective pursued by this Sub-fund is the result of the consecutive steps of the investment process as outlined below:



The criteria which the issuers must meet in order to be included in the investment universe are determined through independent external research and/or internal research at the Manager. These selection criteria are as follows:

- Global Standards compliance filter: Companies must comply with the founding principles of the Global Compact (human rights, labour law, protection of the environment, fight against corruption and environmental protection) and the UN Guiding Principles, ILO instruments, the OECD Guidelines for Multinational Enterprises and the underlying conventions and treaties. The Manager uses specific ESG research from non-financial rating agencies to determine whether or not a company is in compliance with these standards.
- Exclusion filter for companies involved in controversial activities: The policy of excluding controversial activities defined by the Manager (available at www.dpamfunds.com (Controversial Activities Policy)) covers several sectors and economic activities that are subject to debate as to whether or not they are ethical and sustainable. For each of these sectors and economic activities, the exclusion policy for controversial activities defines the exclusion criteria and thresholds. Companies involved in these controversial sectors and activities and meeting the exclusion criteria set out in the policy are excluded from the investment portfolio.

- Exclusion filter for companies involved in extremely serious ESG controversies: Companies should not be involved in extremely serious ESG controversies, such as incidents or allegations related to environmental, social or governance issues.

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

- Quantitative ESG approach ("best-in-class"): The Manager filters the universe prior to the application of the ESG and sustainable investment selection methodology according to a screening based on the quality of the ESG profile of companies, assessed by non-financial rating agencies. The bottom decile (10%) of the economic sector ranking is not eligible for investment.
- Qualitative ESG approach: The quantitative screening is complemented by qualitative analyses based on the Manager's fundamental research and dialogues with companies on financial issues relating to the companies' strategy and the most relevant and material ESG risks and issues to which they are exposed.
- Impact research and sustainability issues: The Manager ensures that the products and/or services of the company contribute – as a proportion of its revenue – to the achievement of the 17 environmental or social Sustainable Development Goals (SDGs) defined by the United Nations (UN) such as health products and services, education services, water saving and access solutions, energy efficiency solutions, digitalisation services, sustainable mobility services, etc.

Compliance and exclusion filters for securities 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.

Each time a data series is collected, the Manager draws up exclusion lists which are updated at least quarterly and on an ad hoc basis in the event of a deterioration in the position. There is an exclusion list for each binding element and strategy group, and the Manager applies a similar exclusion/restriction threshold for investment. The Manager'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 the Manager's strategies.

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

The best-in-class screening is carried out every six months. The calculation of the positive net contribution to the sustainable investment objectives is done on a regular basis.

In the event that a company's ESG profile deteriorates and it is downgraded to Global Standards noncompliant status or an extremely serious controversy regarding the company emerges, the Manager will sell the relevant investment in the interest 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 policy to assess good governance practices of the investee companies?

Good governance criteria are an integral part of the Manager's active shareholding, engagement and sustainable and responsible investment policies, and are included in the investment decision process through the different steps of the sustainable investment selection methodology described above. The Manager takes these criteria into account in the following way:

- i) exclusion filter based on compliance with Global Standards: Prevention of corruption is one of the four main themes of the 10 principles of the United Nations Global Compact.
- exclusion filter for companies involved in ESG controversies of maximum severity: good governance criteria (business ethics, political lobbying, corporate governance, corruption and accountability of governance bodies with regard to ESG aspects) are analysed for controversies, their severity and corrective measures.
- iii) quantitative ESG ("best-in-class") approach: governance criteria in the broad sense and corporate governance criteria in particular are an integral part of the "best-in-class" exercise, which uses external ESG ratings to define the eligible universe.
- iv) Qualitative ESG approach: Much of the fundamental research of the Manager is devoted to governance and corporate governance issues.

Governance issues are also an integral part of the monitoring of investments, notably through the Manager's voting policy and engagement policy which are available at www.dpamfunds.com ("Voting policy/Engagement policy").

What is the asset allocation and the minimum share of sustainable investments?

By applying the investment strategy described above, the Sub-fund invests a minimum of 70% of its assets to achieve its sustainable investment objective. These sustainable investments (in the table below referred to as "#1 Sustainable") have:

- i) (i) an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy, or
- ii) (ii) an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy, or



iii) (iii) a social objective

1# Sustainable covers sustainable investments with environmental or social objectives.

2# Not Sustainable includes investments which do not qualify as sustainable investments.

How does the use of derivatives attain the sustainable investment objective?

The derivative products that may be employed will not be used for the purpose of achieving the sustainable investment objective.



Asset allocation describes the share of investments in specific assets.

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

Transitional activities are activities for which lowcarbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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

Minimum of 4%. Sustainable investments that are aligned with the EU Taxonomy (referred to in the table as "EU Taxonomy aligned") consist of investments in companies whose economic activities substantially contribute to the environmental objectives of climate change mitigation and/or adaptation as defined by the EU Taxonomy in accordance with the eligibility and technical selection criteria ("EU Taxonomy Technical Selection Criteria").

The Manager's methodology for assessing the EU Taxonomy alignment of investee companies is based on data provided either by the investee companies or by third party providers. The latter use a mixed approach:

- Firstly, a direct mapping between the business activities in their own sectoral classification system and the economic activities covered by the Technical Selection Criteria of the EU Taxonomy.
- Secondly, any business activity that could not be directly mapped is examined through a bottom-up assessment of its alignment with the EU Taxonomy's Technical Selection Criteria.
- Any economic activity remaining after the first and second steps is considered not to be aligned with the EU Taxonomy.

In principle, the extent to which investments are investments in environmentally sustainable economic activities within the meaning of the EU Taxonomy is assessed by means of turnover (based on performance data provided by third-party suppliers).

Where information on the extent to which investments are investments in environmentally sustainable economic activities within the meaning of the EU Taxonomy cannot be readily obtained from information published by the invested issuers, the Manager shall rely on equivalent information obtained by third-party providers from the invested issuers.

The compliance of these investments with the requirements set out in Article 3 of the EU Taxonomy will not be subject to a guarantee provided by one or more auditors or a review by one or more auditors or a review by one or more third parties.

Further information on methodology and data resources is available in the information on this Subfund via www.dpamfunds.com (in particular in the sections "Methodologies" and "Data Sources and Data Processing").

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

The Sub-fund does not seek to invest in enabling and/or transitional activities.



Based on the approach described above, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 25%. Only two of the six environmental objectives defined by the EU Taxonomy are currently covered by the regulatory framework of the EU Taxonomy Technical Selection Criteria that determine alignment with the EU Taxonomy (adaptation and climate change mitigation). Similar criteria for the other four environmental objectives have yet to be developed. In the meantime, the Manager wishes to continue to make sustainable investments that contribute to environmental objectives not covered by the current EU Taxonomy Technical Selection Criteria, including key environmental objectives such as the sustainable use and protection of water and marine resources, the prevention and control of pollution and the protection and restoration of biodiversity and ecosystems. To this end, the Manager has adopted and defined a specific framework for identifying the environmental objectives of these sustainable investments and assessing their contribution to these objectives. This framework uses data from investee companies and third-party suppliers and assesses the negative and positive contribution of (potential) investee companies, as a percentage of their turnover, to the UN Sustainable Development Goals (SDGs) that can be attributed to environmental objectives.



an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

are sustainable

investments with

The Manager will review and reassess this framework when the EU Taxonomy Technical Selection Criteria have been implemented for the other four environmental objectives defined by the EU Taxonomy. Further information on methodology and data resources is available in the information on this Sub-fund via www.dpamfunds.com (in particular in the sections "Methodologies" and "Data Sources and Data Processing").



What is the minimum share of sustainable investments with a social objective?

Based on the below approach, the minimum share of socially sustainable investments is 25%. A European Taxonomy for social sustainability goals has yet to be developed. In the meantime, the Manager wishes to continue to make sustainable investments that contribute to the achievement of key social goals such as zero hunger, quality education and peace, justice and strong institutions. To this end, the Manager has adopted and defined a specific framework for identifying the social objectives of these sustainable investments and assessing their contribution to these objectives. This framework uses data from investee companies and third-party suppliers and assesses the negative and positive contribution of (potential) investee companies, as a percentage of their turnover, to the UN Sustainable Development Goals (SDGs) that can be attributed to social objectives. The Manager will review and reassess this framework when the EU Taxonomy Technical Selection Criteria have been implemented for the social objectives under the EU Taxonomy. Further information on methodology and data resources is available in the information on this Sub-fund via www.dpamfunds.com (in particular in the sections "Methodologies" and "Data Sources and Data Processing").



What investments are included under "#2 Not sustainable", 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 whole portfolio, excluding the:

- Liquid assets
- Derivative instruments
- Collective investment schemes

The Sub-fund may invest or hold these types of assets for the purpose of achieving investment objectives, portfolio diversification, liquidity management and risk hedging.

This remaining proportion will never exceed 30% of the portfolio.

Given the nature of these instruments, there are no minimum environmental or social guarantees



Sustainability indicators measure how the sustainable objectives of this financial product are attained.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable.

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

Not applicable.

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

Not applicable.

- How does the designated index differ from a relevant broad market index? Not applicable.
- Where can the methodology used for the calculation of the designated index be found? Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website: www.dpamfunds.com (Fund/sub-fund/share class/"Sustainability transparency" tab).