

## SUSTAINABLE FINANCE DISCLOSURE REGULATION: ARTICLE 10

# World Sustainability Equity Fund

IE000NI56VW8 (EUR Acc.) | IE000A2PTTN4 (EUR Dis.) | IE0004AHP0R3 (GBP Acc.) | IE000VWAWU7M9 (GBP Dis.) | IE0001L9WEV8 (NOK Acc.) | IE000KF8GKU6 (SEK Acc.) | IE000FB3MEU9 (SGD Acc.) | IE000I4VGET6 (SGD Dis.) | IE0004S98W11 (USD Acc.) | IE000J5I5O91 (USD Dis.)

## A. Summary

This fund promotes environmental and/or social (E/S) characteristics, but does not have as its objective sustainable investment. No reference benchmark has been designated for the purpose of attaining the E/S characteristics promoted by the fund.

### E/S characteristics and investment strategy

The fund generally seeks to invest in direct holdings and **a minimum of 90% of its investments will be aligned with the E/S characteristics** promoted by the fund:

1. Lower exposure to companies with high **greenhouse gas emissions**: The fund reduces its weighted average **carbon intensity** exposure relative to the fund's eligible market universe by at least 50%.
2. Lower exposure to companies owning **coal, oil and gas reserves**: The fund reduces its weighted average **potential emissions from reserves** exposure relative to the fund's eligible market universe by at least 75%.
3. Exclusion of companies with **adverse environmental impacts** through material involvement in business activities related to palm oil, factory farming or coal: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the fund's eligible market universe.
4. Exclusion of companies with **adverse social impacts** through material involvement in business activities related to adult entertainment, alcohol, gambling, tobacco, civilian firearms, controversial weapons (e.g. cluster munitions, anti-personnel mines, chemical and biological weapons or depleted uranium ammunition and armour), nuclear weapons or private prisons: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the fund's eligible market universe.
5. Exclusion of companies identified as operating in a manner inconsistent with **responsible business conduct standards**, such as those defined by the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises, because of material involvement in severe controversies related to the environment (e.g. land use and biodiversity, toxic spills and releases, operational waste or water management), society (e.g. child labour or human rights) or corporate governance (e.g. corruption or fraud): The exclusions are measured by determining the weight of companies identified as operating in a manner inconsistent with responsible business conduct standards in the fund relative to the fund's eligible market universe.

Potential remaining investments may include additional assets, such as cash, cash equivalents, derivatives and collective investment schemes.

The fund is designed to pursue its promoted E/S characteristics within a broadly diversified, systematic and cost-effective investment framework to provide investors the opportunity to reflect their sustainability values without sacrificing sound investment principles.

The foundation of the fund is an investment strategy that systematically targets drivers of higher expected returns, including the size, value and profitability premium. The fund achieves this objective by generally emphasising companies with smaller market capitalisations, lower relative prices and higher profitability on a continuous basis relative to the fund's eligible market universe.

Within this initial investment universe, the fund uses a combination of security weighting and exclusion criteria to attain the promoted E/S characteristics outlined above.

## A. Summary (cont.)

### E/S characteristics and investment strategy (cont.)

The E/S characteristics and sustainability indicators outlined above are monitored on a regular basis throughout the lifecycle of the fund by Dimensional's Portfolio Management Group. Additionally, our Compliance Department employs controls to verify that the E/S characteristics promoted by the fund are attained on an ongoing basis.

Dimensional has implemented a policy to evaluate the governance practices of portfolio companies. If a company fails the good governance test, Dimensional will cease further investments in the company and will assess whether divestment is merited.

### Data, limitations and due diligence

Dimensional uses data from external vendors, including MSCI ESG Research ("MSCI") and ISS. This data may be cross-referenced and validated in order to create proprietary data sets. Additionally, we may conduct in-house research by using information from Bloomberg, reported financial data, other company filings, company websites, sector affiliations, industry groups or government entities in order to create internal data sets that may supplement the external data sets.

Our Investment Analytics and Data team and Portfolio Management Group actively monitor data quality through a variety of automated validations, including period-to-period data changes, comparisons of data between multiple vendors, and more manual quality assurance mechanisms.

The environmental and social data landscape is still maturing. A lack of company reported data remains one of the primary limitations. For example, the coverage of reported greenhouse gas emissions tends to be lower for small and emerging market companies, although the trend of available reported data in these markets continues to improve. Another limitation is the inconsistency of data and methodologies across vendors and companies. Dimensional avoids relying on third-party ESG ratings, which are often subjective, and instead focuses on more objective and consistently reported metrics. We take commercially reasonable efforts to collect external data sets and develop internal data sets that allow the fund to attain its promoted E/S characteristics.

Dimensional follows a systematic, process-driven investment approach that integrates due diligence checks throughout our implementation and risk management processes. As part of our process for creating an eligible universe, we review country risks, exchange listing standards, and individual securities for structural, governance-related issues. As part of our portfolio design, portfolio management and trading processes, we implement due diligence checks in order to attain the E/S characteristics promoted by the fund. The backbone of these checks is the integration of reliable E/S data as outlined above. As part of our risk management process, we monitor all portfolio holdings daily for reports of potential involvement in significant controversies, including ESG-related controversies.

### Engagement policies

Dimensional engages with company management and board members at portfolio companies through phone calls, virtual meetings, in-person meetings, or written correspondence.<sup>1</sup> The topics prioritised for engagement may vary by region and country, but in all cases, engagements are tied to our key stewardship priority areas (board structure and composition, material environmental and social risks, shareholder rights, and executive compensation).

More information about Dimensional's general engagement strategy is available in the Investment Stewardship section of our website at <https://www.dimensional.com/who-we-are/investment-stewardship>.

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<sup>1</sup> Dimensional discusses governance matters with portfolio companies to represent client interests; however, Dimensional on behalf of its clients, regardless of such conversations, acquires securities solely for the purpose of investment and not with the purpose or intended effect of changing or influencing the control of any portfolio company.

## B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

## C. Environmental or social characteristics of the financial product

The fund promotes the following E/S characteristics:

1. Lower exposure to companies with high **greenhouse gas emissions** relative to the fund's eligible market universe as further outlined below
2. Lower exposure to companies owning **coal, oil and gas reserves** relative to the fund's eligible market universe as further outlined below
3. Exclusion of companies with **adverse environmental impacts** through material involvement in business activities related to palm oil, factory farming or coal
4. Exclusion of companies with **adverse social impacts** through material involvement in business activities related to adult entertainment, alcohol, gambling, tobacco, civilian firearms, controversial weapons (e.g. cluster munitions, anti-personnel mines, chemical and biological weapons or depleted uranium ammunition and armour), nuclear weapons or private prisons
5. Exclusion of companies identified as operating in a manner inconsistent with **responsible business conduct standards**, such as those defined by the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises, because of material involvement in severe controversies related to the environment (e.g. land use and biodiversity, toxic spills and releases, operational waste or water management), society (e.g. child labour or human rights) or corporate governance (e.g. corruption or fraud)

The fund uses the following sustainability indicators to measure the attainment of each of the promoted E/S characteristics outlined above:

1. Weighted average **carbon intensity** relative to the fund's eligible market universe
  - Represents a company's recently reported or estimated Scope 1 (direct) + Scope 2 (indirect) greenhouse gas emissions in carbon dioxide equivalents (CO<sub>2</sub>e) normalised by sales in USD (metric tons CO<sub>2</sub>e per USD million sales)
  - Greenhouse gases included are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>)
2. Weighted average **potential emissions from reserves** relative to the fund's eligible market universe
  - Represents a theoretical estimate calculated by MSCI of carbon dioxide produced if a company's reported reserves of oil, gas and coal were converted to energy
  - Uses estimated carbon and energy densities of the respective reserves
- 3/4. Weight of companies with material involvement in the stated business activities related to **adverse environmental / social impacts** relative to the fund's eligible market universe
5. Weight of companies identified as operating in a manner inconsistent with **responsible business conduct standards** relative to the fund's eligible market universe

## D. Investment strategy

### Investment strategy used to meet the E/S characteristics promoted by the fund

The fund is designed to pursue its promoted E/S characteristics within a broadly diversified, systematic and cost-effective investment framework to provide investors the opportunity to reflect their sustainability values without sacrificing sound investment principles.

The foundation of the fund is an investment strategy that systematically targets drivers of higher expected returns, including the size, value and profitability premium. The fund achieves this objective by generally emphasising companies with smaller market capitalisations, lower relative prices and higher profitability on a continuous basis relative to the fund's eligible market universe.

Within this initial investment universe, the fund uses a combination of security weighting and exclusion criteria to attain the promoted E/S characteristics outlined above:

1. The fund reduces its weighted average **carbon intensity** exposure relative to the fund's eligible market universe by at least 50%. To implement this binding element, the fund:
  - Overweights sector leaders to emphasise best-in-class companies, underweights sector laggards and excludes from purchase worst-in-class companies primarily based on carbon intensity.
  - Excludes from purchase companies with the highest carbon intensity.
2. The fund reduces its weighted average **potential emissions from reserves** exposure relative to the fund's eligible market universe by at least 75%. To implement this binding element, the fund:
  - Excludes from purchase companies with the largest fossil fuel reserves based on potential emissions from reserves.
- 3/4. The fund excludes companies with material involvement in the stated business activities related to **adverse environmental / social impacts**. The Investment Manager<sup>2</sup> determines material involvement in a business activity by direct evidence (e.g. if annual revenues exceed a defined threshold, such as 20% or 10%) or by indirect evidence (e.g. through ownership), depending on each activity:
  - **Palm oil:** >10% of revenue from palm oil farming and/or palm oil processing
  - **Factory farming:** >10% of revenue from sectors related to factory farming
  - **Coal:** evidence of owning any proven and probable thermal or metallurgical coal reserves or any revenue from the mining of thermal coal and its sale to external parties
  - **Adult entertainment:** >10% of revenue from the production, distribution or retailing of adult entertainment products
  - **Alcohol:** >10% of revenue from the production, distribution, retailing, licensing or supply of alcoholic beverages, key products and services
  - **Gambling:** >10% of revenue from the ownership or operation of gambling facilities or from the support or services to the gambling industry
  - **Tobacco:** >10% of revenue from the production, distribution, retailing, licensing or supply of key tobacco products and services
  - **Civilian firearms:** any revenue from the production of handguns, pistols, shotguns, rifles, revolvers, and ammunition for civilian (nonmilitary) use
  - **Controversial and nuclear weapons:** any involvement in the manufacture of cluster munitions or anti-personnel mines or their key components, chemical and biological weapons or depleted uranium ammunition and armour, or nuclear weapons or their key components
  - **Private prisons:** ownership or any revenue from the operation of private prisons and/or immigrant detention facilities

<sup>2</sup> "Dimensional" and "Investment Manager" may be used interchangeably throughout this document.

## D. Investment strategy (cont.)

Investment strategy used to meet the E/S characteristics promoted by the fund (cont.)

5. The fund excludes companies identified as operating in a manner inconsistent with **responsible business conduct standards** because of material involvement in severe ESG controversies as stated above. The Investment Manager generally determines material involvement in a severe controversy by assessing the perceived nature and scale of a case and a company's role and response:
- The **nature of a case** generally depends on the perceived severity of harm resulting from a controversy. For example, irreparable ecosystem destruction, products or practices being the leading cause of death or evidence of involvement in child labour are serious harms.
  - The **scale of a case** generally depends on the perceived size of its impact, such as the geographical footprint, the level of pollution or the number of people affected. For example, a large oil spill or a large group of people affected over a longer period are considered to be of serious concern.
  - A **company's role**, and thus the materiality of its involvement, generally depends on whether its conduct, products, or operations are believed to have directly contributed to the controversy or have indirectly facilitated the controversy through the actions of affiliates or members of its supply chain. Actions from affiliates are regarded as direct involvement if the company has significant control. Additional considerations include potential intent (e.g. malicious/recurring compared to negligent/reckless behaviour) and implemented controls, amongst others. For example, a controversy resulting from an action over which a company has direct control, and where there was malicious intent, is generally considered to be of serious concern.
  - A **company's response** after the event, involvement in related legal cases, and the Investment Manager's assessment of the proportionality and effectiveness of remediating actions taken since the controversy occurred all feed into the assessment of whether a controversy is still of ongoing concern. Additional considerations include aggravating factors such as actions to hide or conceal involvement. For example, a controversy is generally considered to be of ongoing serious concern if a company has concealed information, failed to acknowledge responsibility and failed to disclose effective remediating actions.

To assess material involvement in a severe ESG controversy, the Investment Manager generally uses an aggregate evaluation, which is a function of all four considerations outlined above.

Additionally, the Investment Manager may consider information from publicly available assessments, such as from Norges Bank Investment Management, in order to determine whether a company should be excluded from the fund. The Investment Manager retains full discretion over the implementation of exclusion criteria and may deviate from third-party assessments on a case-by-case basis.

The binding elements of the investment strategy are implemented by the Investment Manager based on available data. If no relevant information can be obtained from either internal or external sources that would lead a company to be excluded from the fund, the company is deemed to be eligible for investment. Exclusions are not applied to cash, derivatives or third-party fund holdings. Securities lending activities are not expected to impact the attainment of the promoted E/S characteristics.

## D. Investment strategy (cont.)

### Policy to assess good governance practices of portfolio companies

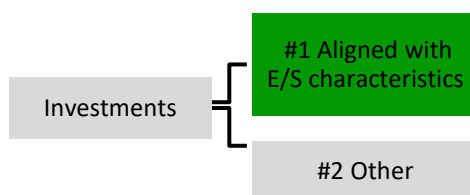
Good corporate governance serves to *protect investors*. Corporate governance standards are assessed as part of the Investment Manager's Exchange Review Process. It includes a qualitative assessment of a given country's governance standards that support investor protection and considers standards related to management structures, employee relations, remuneration of staff, and tax compliance.

Additionally, the Investment Manager's Portfolio Management Group and Investment Stewardship Group regularly monitor and assess corporate governance practices at portfolio companies. Where there are concerns about the governance practices at portfolio companies these are escalated to the Investment Stewardship Committee. In cases where the Investment Stewardship Committee identifies exceptional governance concerns, the Portfolio Management Group will escalate the company to the Manager's Investment Committee, which will decide whether the company fails the good governance practices test for the purposes of Article 8 of the SFDR.

If the company fails the test, the Investment Manager will cease further investments in the company and will assess whether a divestment from the company is merited.

## E. Proportion of investments

The fund generally seeks to invest in direct holdings and **a minimum of 90% of its investments will be aligned with the E/S characteristics (#1)** promoted by the fund. The fund does not intend to achieve a minimum proportion of sustainable investments. Potential remaining investments are included under Other (#2), which may include additional assets, such as cash, cash equivalents, derivatives and collective investment schemes. No specific environmental or social safeguards are applied to Other (#2).



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

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the E/S characteristics, nor are qualified as sustainable investments.

## F. Monitoring of environmental or social characteristics

The E/S characteristics and sustainability indicators outlined above are monitored on a regular basis throughout the lifecycle of the fund by Dimensional's Portfolio Management Group. Additionally, our Compliance Department employs controls to verify that the E/S characteristics promoted by the fund are attained on an ongoing basis:

- The Compliance Department monitors the promoted reductions in weighted average carbon intensity exposure and weighted average potential emissions from reserves exposure on a periodic basis and may provide reports to the Board of Dimensional Ireland Limited for further oversight.
- The Compliance Department monitors the promoted E/S exclusions through compliance rules integrated into Dimensional's Order Management System on a daily basis. These rules are evaluated on both a pre-trade and post-trade basis.

## G. Methodologies for environmental or social characteristics

The following methodologies are applied to measure the sustainability indicators outlined above in order to assess whether the promoted E/S characteristics are met:

1. The fund reduces its weighted average **carbon intensity** exposure relative to the fund's eligible market universe by at least 50%: The weighted average carbon intensity is measured by using the carbon intensity (tCO<sub>2</sub>e/USD millions sales) of each company in the fund or in the fund's eligible market universe and multiplying the carbon intensity by the weight of a company in the fund or in the fund's eligible market universe.
2. The fund reduces its weighted average **potential emissions from reserves** exposure relative to the fund's eligible market universe by at least 75%: The weighted average potential emissions from reserves are measured by using the total potential emissions from reserves (MtCO<sub>2</sub>) of each company in the fund or in the fund's eligible market universe and multiplying the potential emissions from reserves by the weight of a company in the fund or in the fund's eligible market universe.
- 3/4. The fund excludes companies with material involvement in the stated business activities related to **adverse environmental / social impacts**: The exclusions are measured by determining the weight of companies with material involvement in the stated business activities in the fund relative to the fund's eligible market universe.
5. The fund excludes companies identified as operating in a manner inconsistent with **responsible business conduct standards** because of material involvement in severe ESG controversies as stated above: The exclusions are measured by determining the weight of companies identified as operating in a manner inconsistent with responsible business conduct standards in the fund relative to the fund's eligible market universe.

The foundation of the fund's eligible market universe is a proprietary universe of more than 10,000 eligible securities maintained by the Investment Manager. The Investment Manager's Portfolio Management Group evaluates each security before it is added to the proprietary universe and conducts ongoing screens of the universe to determine continued eligibility. Considerations include the length of time since IPO, number of years of operating history, a company's free float, and liquidity criteria.

The fund's eligible market universe is derived from this proprietary universe and consists of securities eligible for the fund prior to the application of the fund's investment strategy that is used to attain the promoted E/S characteristics. The list comprises common stocks, preferred stocks, and depositary receipts of companies traded on Recognised Markets in approved countries as laid out in the fund's Prospectus.

To arrive at the company weights in the fund's eligible market universe, companies are generally weighted based on their free-float market capitalisation by taking into account daily security prices.

## H. Data sources and processing

Dimensional uses data from external vendors, including MSCI ESG Research ("MSCI") and ISS. This data may be cross-referenced and validated in order to create proprietary data sets. Additionally, we may conduct in-house research by using information from Bloomberg, reported financial data, other company filings, company websites, sector affiliations, industry groups or government entities in order to create internal data sets that may supplement the external data sets.

The following data vendors are used to attain each of the E/S characteristic outlined above:

1. Data for carbon intensity are sourced from external vendors, such as MSCI and ISS.
2. Data for potential emissions from coal, oil and gas reserves are primarily sourced from external vendors, such as MSCI, and may be supplemented with internal data sets.
- 3/4. Data for the stated adverse environmental / social impacts are primarily sourced from external vendors, such as MSCI and ISS, and may be supplemented with internal data sets.
5. Data for ESG controversies are primarily sourced from external vendors, such as MSCI and ISS, and may be supplemented with internal data sets and/or information from publicly available assessments.

## H. Data sources and processing (cont.)

In our due diligence process, we evaluate data coverage and quality, and review the data methodology of each vendor. Data is acquired and processed automatically through our systems, where possible, to reduce operational risks and unnecessary manual intervention. Vendors typically deliver updates to their respective data sets on a monthly or quarterly basis, depending on the data set. Dimensional's Investment Analytics and Data team (part of the Research Group) handles the integration and curation of these data sets within our internal systems, as well as the integration of data sets into the portfolio construction process and into necessary reporting processes.

Our Investment Analytics and Data team and Portfolio Management Group actively monitor data quality through a variety of automated validations, including period-to-period data changes, comparisons of data between multiple vendors, and more manual quality assurance mechanisms. Issues that surface in the quality controls are escalated to the relevant vendors as necessary and are tracked through remediation.

Evaluating the proportion of sourced data that are estimated is challenging. Dimensional's vendors are continuously developing and integrating company reported data as they become available and may not always disclose the underlying data source. We anticipate the availability of reported data to increase, and therefore the proportion of estimated data to decrease, as companies begin to adopt the EU Corporate Sustainability Reporting Directive (CSRD).

## I. Limitations to methodologies and data

The environmental and social data landscape is still maturing. A lack of company reported data remains one of the primary limitations. For example, the coverage of reported greenhouse gas emissions tends to be lower for small and emerging market companies, although the trend of available reported data in these markets continues to improve. Another limitation is the inconsistency of data and methodologies across vendors and companies. Dimensional avoids relying on third-party ESG ratings, which are often subjective, and instead focuses on more objective and consistently reported metrics. We take commercially reasonable efforts to collect external data sets and develop internal data sets that allow the fund to attain its promoted E/S characteristics.

For example, external vendors provide reported or modelled carbon intensity data for nearly all of the companies eligible for Dimensional sustainability funds when measured by free-float market capitalisation. Companies where carbon intensity data is not available are assigned a sector average value. Companies where potential emissions from reserves data is not available, either from external or internal data sets, are assigned zero emissions.

Companies for which data on the screened adverse E/S impacts may not be available are typically very small companies that fall outside the eligible universe of external vendors and for which relevant public information is hard to identify manually. These companies often have attractive investment characteristics. Dimensional therefore believes that the small risk of holding an immaterial exposure to the screened adverse E/S impacts by including potentially involved companies in the fund's eligible universe (instead of making all companies ineligible) is more than offset by the diversification and investment benefits of holding these companies in aggregate.



## J. Due diligence

Dimensional follows a systematic, process-driven investment approach that integrates due diligence checks throughout our implementation and risk management processes:

- As part of our process for creating an eligible universe, we review country risks, exchange listing standards, and individual securities for structural, governance-related issues. For example, we may exclude companies from eligibility if they are closely held; such companies may not have adequate risk controls to protect the interests of minority shareholders against abusive practices by company insiders. We also assess exchange listing requirements against certain standards, for example, accounting standards and the level of shareholder protection offered. We may exclude companies from eligibility if they are listed on exchanges whose listing requirements fail to meet these standards.
- As part of our portfolio design, portfolio management and trading processes, we implement due diligence checks in order to attain the E/S characteristics promoted by the fund. The backbone of these checks is the integration of reliable E/S data as outlined above. For example, E/S exclusions are integrated into the fund's portfolio design and prevent portfolio management systems from creating buy orders for companies involved in a screened adverse E/S impact. Additionally, the exclusions are coded into compliance rules by members of our Compliance Department and reviewed by members of the Portfolio Management Group. The system is monitored on a daily basis by members of our Compliance Department at both the pre-trade stage and post-trade stage. The Compliance Department also monitors existing portfolio holdings and potential exposures when exclusion lists are updated. Should existing holdings, compliant at the time of initial purchase, subsequently become flagged for involvement in a screened adverse E/S impact, they will be divested by our Portfolio Management Group within a reasonable period considering turnover, liquidity and associated trading costs.
- As part of our risk management process, we monitor all portfolio companies daily for reports of potential involvement in significant controversies, including ESG-related controversies. If we believe that these controversies are likely to have a material impact on a portfolio company's financials, we may temporarily exclude the portfolio company from purchase and may also refer the portfolio company to our Investment Stewardship Group. Examples of ESG controversies include, but are not limited to, those related to worker safety, environmental impact, consumer lawsuits, and fraud.

## K. Engagement policies

Dimensional engages with company management and board members at portfolio companies through phone calls, virtual meetings, in-person meetings, or written correspondence. The topics prioritised for engagement may vary by region and country, but in all cases, engagements are tied to our key stewardship priority areas (board structure and composition, material environmental and social risks, shareholder rights, and executive compensation). For instance, we engage with companies to encourage the adoption of robust policies and procedures for managing risk (including environmental and social risk) and effective board oversight. The goal of our engagement efforts is to encourage companies to improve their corporate governance in these areas, which may result in increased valuations through a combination of lower discount rates and higher cash flows.

We monitor portfolio companies' risk oversight practices as part of our standard stewardship activities. We may use ESG data, such as SASB data, to help identify candidates for engagement or to inform our engagements. Furthermore, we track our engagements on ESG issues and follow up with portfolio companies on outcomes. If we believe that portfolio company boards have not adequately addressed shareholder concerns, we may determine to exercise our proxy votes against the appropriate board members.

More information about Dimensional's general engagement strategy is available in the Investment Stewardship section of our website at <https://www.dimensional.com/who-we-are/investment-stewardship>.

## L. Designated reference benchmark

No reference benchmark has been designated for the purpose of attaining the E/S characteristics promoted by the fund.

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