

## SUSTAINABLE FINANCE DISCLOSURE REGULATION: ARTICLE 8

# Sustainability Funds

The Funds promote sustainability in accordance with Article 8 of Regulation (EU 2019/2088) on sustainability related disclosures in the financial services sector (SFDR). The Funds do not have sustainability investment as their investment objective but as part of the Fund's investment policy, the investment manager of the Funds (the "Investment Manager"), does take into account the sustainability impact associated with securities when making investment decisions for the Funds. Relative to a portfolio that does not take sustainability impact considerations into account, the Funds will exclude or underweight securities of issuers that, according to the Funds' sustainability impact considerations, may have a relatively negative impact on the environment and sustainability interests as compared either to other issuers in the Funds' investment universe or other issuers with similar business lines. Similarly, relative to a portfolio that does not take environmental and sustainability impact considerations into account when determining its investments, the Funds will overweight securities of issuers that, according to the Funds' sustainability impact considerations, may have a relatively less detrimental impact on the environment and sustainability interests as compared either to other issuers in the Funds' investment universe or other issuers with similar business lines. While the Funds promote sustainability and the Investment Manager takes into account sustainability impact considerations, the Funds' investments are not evaluated against the EU criteria for environmentally sustainable economic activities and, therefore, the "do no significant harm" principle does not apply to the Funds' investments.

In considering sustainability impact and other factors that the Investment Manager believes may be important to investors, the Investment Manager aims to exclude or underweight top contributors to greenhouse gas emissions as compared to their representation in the Funds' investment universe, as well as issuers with high levels of potential emissions from reserves. With respect to its holdings of securities of corporate issuers, the Funds' primary sustainability goal is to provide a reduction in exposure to greenhouse gas emissions intensity of at least 50% and a reduction in exposure to potential emissions from reserves of at least 75% relative to the corporate issuer market. The Funds assess corporate issuers on several considerations – greenhouse gas emissions intensity, potential emissions from fossil fuel reserves, land use and biodiversity, toxic spills and releases, operational waste, and water management, with the vast majority of weight placed on greenhouse gas emissions intensity. Greenhouse gas emissions intensity represents an issuer's most recently reported or estimated Scope 1 (direct) + Scope 2 (indirect) greenhouse gas emissions converted to carbon dioxide (CO<sub>2</sub>) equivalents, normalised by sales in USD (metric tons 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), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>). Potential emissions are an estimate of carbon dioxide produced if an issuer's reserves of oil, gas, and coal were converted to energy, given estimated carbon and energy densities of the respective reserves. Securities are then ranked relative to their peers and either excluded, underweighted, or overweighted to achieve the aforementioned reduction in exposure to greenhouse gas emissions intensity and potential emissions from reserves.

When determining whether to exclude or underweight a corporate issuer, the Investment Manager considers, where such information is available, whether there is material involvement with land use controversies, civilian firearms manufacturing, biodiversity controversies, involvement in toxic spills or releases, operational waste controversies, water use controversies, tobacco, palm oil, coal, child labor, alcohol, adult entertainment, gambling, nuclear weapons, and factory farming activities, among other factors. The environmental and sustainability impact considerations listed above are examples of factors

that the Investment Manager believes indicate whether or not a corporate issuer, as compared to other corporate issuers with similar business lines, promotes environmental and sustainability interests by pursuing economic growth and development that meets the needs of the present without compromising the needs of future generations.

Sustainability impact considerations applied to the Funds are based on available data, either actual or estimated, and the Investment Manager's interpretation of the data. The Investment Manager engages third party service providers, such as MSCI, to provide research and ratings information relating to the Funds' environmental and sustainability impact considerations with respect to securities in the Funds, where information is available from such providers. Additionally, the Investment Manager conducts its own research. Based on research and ratings information, the Investment Manager will assess each issuer's relative sustainability impact, which is then used to determine whether a security should, relative to a portfolio without these considerations: (i) be excluded from the Funds' holdings; (ii) have its weight decreased within the Funds; (iii) be held with no adjustment to its weight within the Funds; or (iv) have its weight increased within the Funds. The Investment Manager may also exclude or decrease the weight of specific issuers due to concerns over any specific matter.

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