

Sustainability-related disclosures: Vanguard ESG Developed Europe All Cap UCITS ETF (the “Fund”) v. March 2025

Legal entity identifier: 5493006KU25F8HQPSJ92

(a) Summary

Environmental or social characteristics and investment strategy

The Fund promotes the following environmental characteristics:

- reduction of environmental harm by excluding investments in companies based on certain fossil fuel related activities.

The Fund also promotes the following social characteristics relating to social norms and standards:

- human rights, labour rights and anti-corruption as set out in the principles of the UN Global Compact; and
- avoiding the financing of controversial weapons, including nuclear weapons.

The Fund promotes these environmental characteristics through the screening out of stocks of companies from its portfolio based on the potentially detrimental impact of their conduct or products on society and / or the environment.

The Fund is passively managed and promotes the above-mentioned characteristics by tracking the Developed Europe All Cap Choice Index (the “Index”), which is a designated reference benchmark for the purpose of attaining the environmental and social characteristics promoted by the Fund.

The Index methodology excludes stocks of companies that the Index provider determines to (a) be engaged or involved in specific parts of the supply chain for, and / or (b) derive revenue (above a threshold specified by the Index provider) from, certain activities relating to the following:

- (a) vice Products (adult entertainment, alcohol, gambling, tobacco, cannabis);
- (b) non-Renewable Energy (nuclear power and fossil fuels (which includes (i) companies that have greater than 50% ownership of companies that own proved or probable reserves in coal, oil or gas, (ii) oil and gas production and supporting services, (iii) coal extraction, production and supporting services, (iv) oil and gas and thermal coal power generation, (v) extraction of arctic oil and gas and (vi) oil sands)); and
- (c) weapons (chemical & biological weapons, cluster munitions, anti-personnel landmines, nuclear weapons, civilian firearms, and conventional military weapons).

The Index provider defines what constitutes “involvement” in each activity. This may be based on percentage of revenue or any connection to a restricted activity regardless of the amount of revenue received, and will relate to specific parts of the supply chain. Details regarding what constitutes “involvement” for each activity and/or the revenue thresholds applied can be found in Appendix A (Product-related exclusions) of the FTSE ground rules document found at the links below under the heading ‘Where can the methodology used for the calculation of the designated index be found?’. Additional details regarding the rules applied by the Index provider, including treatment of company ownership structures, can be found in the documents which are linked to in the ground rules document.

The Index methodology also excludes companies based on certain controversial conduct, which is achieved by excluding companies that meet the following criteria in relation to the United Nations Global Compact Principles regarding labour, human rights, environmental, and anticorruption standards:

- o for large and mid-cap sized companies (as determined by the Index provider), those which have been deemed ‘Non-Compliant’ with such standards; and
- o for small-cap size companies (as determined by the Index provider), those which have been deemed either ‘Watchlist’ or ‘Non-Compliant’ with such standards,

in each case by reference to data provided by a third party data provider (further details of which may be obtained in the documents linked to in the ‘Further information on the Index’ section above).

The Index also excludes companies specifically on the USA’s Department of Homeland Security’s Uyghur Forced Labor Prevention Act Entity List.

While the Fund promotes environmental and social characteristics, it does not commit to making sustainable investments (including environmentally sustainable investments within the meaning of the Taxonomy Regulation). As such, the Fund makes a minimum commitment of 0% in environmentally sustainable investments. 90% of the assets are aligned with environmental and / or social characteristics.

Monitoring and methodologies

The Investment Manager will measure the attainment of the environmental and social characteristics by assessing the extent to which the exclusion criteria described above have been applied and measuring the proportion of the portfolio excluded from the Parent Index (being the FTSE Developed Europe All Cap Index).

Regarding methodologies, the Index rebalances on a quarterly basis, at which time the Parent Index (FTSE Developed Europe All Cap Index) is screened for the ESG exclusions criteria. Apart from scheduled rebalances, the Index Provider may carry out additional ad hoc rebalances to the Index in order, for example, to correct an error in the selection of Index constituents.

In addition, the Index Provider has its own set of internal processes, which are independent of the Investment Manager.

Data sources and limitations

The Index Provider collects information from publicly available sources and third-party data on an annual basis for each company, following the publication of the company's annual report.

However, there is a lack of availability of self-reported data of the companies included within the Index. Data may therefore be based on assumptions, forecasts, projections, estimations and opinions of the Index Provider and their third-party providers. The Index Provider, as part of their methodology, applies the necessary screens which ensures that the E/S characteristics are met for the Fund.

Due diligence

The Investment Manager conducts due diligence in respect of the Index Provider prior to appointment and on an ongoing basis. The Index Provider is responsible for implementing the index methodology and conducting all necessary screens to ensure constituents adhere to this methodology.

Engagement policies

Not applicable.

Designated reference benchmark

This Fund is passively managed. Its objective is to track the performance of the FTSE Developed Europe All Cap Choice Index. For this reason, the Index also serves as the designated Reference Benchmark for the purpose of attaining the environmental and / or social characteristics promoted by the Fund.



(b) No sustainable investment objective

Does the Fund have sustainable investment as its objective?

The Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

(c) Environmental or social characteristics of the financial product

What environmental and / or social (E/S) characteristics are promoted by this financial product?

The Fund promotes environmental and social characteristics by excluding companies from its portfolio based on the impact of their conduct or products on society and / or the environment.

For information on the screening criteria, please refer to the summary section above. Further details of the screening criteria including the involvement thresholds for inclusion can be found in the FTSE Global Choice Index Series Ground Rules. Product- related exclusions can be found in Appendix A and conduct-related exclusions can be found in the Controversies section of Appendix B: https://research.ftserussell.com/products/downloads/FTSE_Global_Choice_Index_Series_Ground_Rules.pdf

(d) Investment strategy

What is the investment strategy used to meet the E/S characteristics promoted by the financial product?

The Fund employs a “passive management” – or indexing – investment approach, through physical acquisition of securities, designed to track the performance of the FTSE Developed Europe All Cap Choice Index. The Fund will invest in a portfolio of equity securities of companies located in developed markets in Europe. In seeking to track the performance of the Index, the Fund attempts to replicate the Index by investing all, or substantially all, of its assets in the stocks that make up the Index, holding each stock in approximately the same proportion as its weighting in the Index. When not practicable to fully replicate, the Fund may use a sampling process to invest in a portfolio of securities that consists of a representative sample of the component securities of the Index.

The binding element of the investment strategy is the exclusionary screening methodology, which is detailed in the summary section above.

What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

The assessment of good governance practices is incorporated into the Index methodology. The Index excludes the stocks of companies based on certain controversial conduct, which is achieved by excluding companies that meet the following criteria in relation to the United Nations Global Compact Principles and other international norms regarding labour, human rights, environmental, and anti-corruption standards:

- for large and mid-cap sized companies (as determined by the Index provider), those which have been deemed ‘Non-Compliant’ with such standards; and
- for small-cap size companies (as determined by the Index provider), those which have been deemed either ‘Watchlist’ or ‘Non-Compliant’ with such standards,

in each case by reference to data provided by a third party data provider (further details of which may be obtained in the prospectus).

The Investment Manager relies on the Index Provider to assess good governance practices based on the controversy screening.

(e) Proportion of investments

What is the asset allocation planned for this product?

The binding element of the investment strategy is solely the exclusionary screening methodology of the Index. This excludes companies which are engaged in, or derive revenue from, certain activities, from the Index based on the impact of their conduct or products on society and / or the environment (as further described above).

It is expected that at least 90% of the Fund's assets will be invested in constituents of the Index and accordingly, are determined to be aligned with the environmental and social characteristics promoted by the Fund.

Up to 10% of assets fall into the sub-category "#2 Other". These represent indirect exposures (including derivatives) which are used for efficient portfolio management purposes only. The Fund does not apply any minimum environmental or social safeguards to such investments.

The Fund does not commit to make any sustainable investments.

Does this product have planned indirect exposures to entities?

The Fund does not plan to use indirect exposures (including derivatives) to attain the environmental or social characteristics promoted by the Fund.

(f) Monitoring of environmental or social characteristics

How are the E/S characteristics promoted by the financial product and the Sustainability Indicators used to measure the attainment of each of those E/S characteristics promoted by the financial product monitored throughout the lifecycle of the financial product?

The Investment Manager will measure the attainment of the environmental and social characteristics by:

- measuring the proportion of the portfolio excluded from the Parent Index (being the FTSE Developed Europe All Cap Index) and
- assessing the extent to which the exclusion criteria described above have been applied

The first sustainability indicator, the proportion of the portfolio excluded from the Parent index, is monitored by the Investment Manager on an annual basis to include in the annual reports.

The second sustainability indicator, the extent to which the exclusion criteria have been applied, is monitored by the Investment Manager on a regular basis through internal and external controls, as discussed below.

What are the related internal control mechanisms?

Rebalancing activity in ESG index funds is reviewed and overseen by several 'lines of defense', including our portfolio management, risk management, investment data and product teams. Inputs from third-party data providers, consistent with the Index Provider's own ESG data, are used to analyse index constituents as part of this review process. This helps mitigate the risk of the Fund holding index constituents that are inconsistent with the specified ESG screening criteria.

There are additional internal trade compliance controls, that will check whether new instruments bought are benchmark constituents as well as checking for any fund holdings that may no longer be part of the benchmark. These checks aim to confirm that out of benchmark holdings are not added and are removed in a timely fashion. The Investment Manager will monitor tracking error (difference between portfolio and benchmark) on a daily basis and follow up on any significant deviations.

What are the related external control mechanisms?

The Index rebalances on a quarterly basis, at which time the Parent Index (FTSE Developed Europe All Cap Index) is screened for the ESG exclusions criteria. Apart from scheduled rebalances, the Index Provider may carry out additional ad hoc rebalances to the Index in order, for example, to correct an error in the selection of Index constituents.

The Index Provider has implemented controls, which are independent of the Investment Manager. Further information in relation to the Index Provider's oversight process can be obtained at:

https://research.ftserussell.com/products/downloads/FTSE_Russell_Governance_Framework.pdf

(g) Methodologies

What are the methodologies to measure how the E/S characteristics promoted by the financial product are met?

The Fund promotes environmental and social characteristics by excluding companies from its portfolio based on the impact of their conduct or products on society and / or the environment. For information on the screening criteria, please refer to the summary section above.

The Index rebalances on a quarterly basis, at which time the Parent Index (FTSE Developed Europe All Cap Index) is screened for the ESG exclusions criteria. Apart from scheduled rebalances, the Index Provider may carry out additional ad hoc rebalances to the Index in order, for example, to correct an error in the selection of Index constituents.

The Index Provider has its own set of internal processes, which are independent of the Investment Manager. Further information in relation to the Index Provider's methodologies can be obtained at:

https://research.ftserussell.com/products/downloads/FTSE_Global_Choice_Index_Series_Ground_Rules.pdf

(h) Data sources and processing

What are the data sources used to attain each of the E/S characteristics promoted by the financial product?

The Index Provider collects information from publicly available sources and third-party data on an annual basis for each company, following the publication of the company's annual report.

The Index Provider's proprietary data is the primary source for determining business activity exclusions, supplemented by third party data. Further information in relation to the Index Provider's operational details can be obtained at:

https://research.ftserussell.com/products/downloads/Guide_to_the_Construction_and_Maintenance_of_FTSE_Exclusion_Lists.pdf

What measures are taken to ensure data quality?

From an external perspective, the Index Provider has its own set of internal processes which are independent of the Investment Manager. This includes due diligence to confirm that appropriate quality controls are in place in data sourcing and delivery for third-party data.

From an internal perspective, rebalancing activity in ESG index funds is reviewed and overseen by several 'lines of defense', including our portfolio management, risk management, investment data and product teams. Inputs from third-party data providers, consistent with the Index Provider's own ESG data, are used to analyse index constituents as part of this review process. This helps mitigate the risk of our funds holding index constituents that are inconsistent with the specified ESG screening criteria.

How are the data processed?

The Investment Manager does not perform any data processing with regards to the screening criteria, which is carried out by the Index Provider. Further information in relation to the Index, including current details as to its methodology can be obtained at https://research.ftserussell.com/products/downloads/FTSE_Global_Choice_Index_Series_Ground_Rules.pdf

What is the proportion of data that are estimated?

It is currently complex to report sufficiently accurate numbers on the proportion of data that is estimated. The Index Provider uses estimated data under specific circumstances; this is independent of the Investment Manager.

(i) Limitations to methodologies and data

What are the limitations to the methodologies referred to in section (g) and the data sources referred to in section (h)?

The main limitation is the availability of self-reported data of the companies included within the Index. Data may therefore be based on assumptions, forecasts, projections, estimations and opinions of the Index Provider and their third-party providers.

How do such limitations not affect how the E/S characteristics promoted by the financial product are met?

The Index Provider, as part of their methodology, applies the necessary screens which ensures that the E/S characteristics are met for the Fund. Furthermore, data availability will improve over time due to increasing regulatory disclosure requirements, such as the anticipated introduction of CSRD (The Corporate Sustainability Reporting Directive) in 2028.

(j) Due diligence

What due diligence is carried out on the underlying assets of the financial product (including the internal and external controls)?

The Investment Manager conducts due diligence in respect of the Index Provider prior to appointment and on an ongoing basis. The Index Provider is responsible for implementing the index methodology and conducting all necessary screens to ensure constituents adhere to this methodology. The Investment Manager focuses on the processes and procedures that the relevant Index Provider has in place on an ongoing basis. Please refer to section (f) for further details of the Investment Manager's processes and procedures.

Additionally, where the Index Provider has insufficient or no data available to adequately assess a particular company relative to the ESG criteria of the Index, such companies may be excluded from the Index until such time as they may be determined to be eligible by the Index Provider.

(k) Engagement policies

What is the engagement policy implemented where engagement is part of the environmental or social investment strategy (including any management procedures applicable to sustainability-related controversies in investee companies)?

Not applicable.

(l) Designated reference benchmark

Has an index been designated as a reference benchmark to meet the E/S characteristics promoted by the financial product?

This Fund is passively managed. Its objective is to track the performance of the FTSE Developed Europe All Cap Choice Index. For this reason, the Index also serves as the designated Reference Benchmark for the purpose of attaining the environmental and / or social characteristics promoted by the Fund.

How is this index aligned with the E/S characteristics promoted by the financial product?

The Index is constructed from the FTSE Developed Europe All Cap Index which is then screened for certain environmental, social, and corporate governance criteria by the sponsor of the Index, which is independent of Vanguard.

The Index rebalances on a quarterly basis, at which time the Parent Index (FTSE Developed Europe All Cap Index) is screened for the ESG exclusions criteria.

Apart from scheduled rebalances, the Index Provider may carry out additional ad hoc rebalances to the Index in order, for example, to correct an error in the selection of Index constituents.

The Investment Manager monitors the Index and its exclusions on a regular basis to ensure the alignment of the investment strategy with the methodology of the index.

Where can one find information with regards to input data, methodologies used to select those data, the rebalancing methodologies and index calculations?

Further information in relation to the Index, including current details as to its exact composition, methodology, exclusions and any revenue thresholds, can be obtained at <https://www.ftserussell.com/products/indices/global-choice>

Further Information

Please refer to the link below to access the sustainable finance disclosures of the Fund set out within the prospectus of Vanguard Funds plc.

<https://fund-docs.vanguard.com/etf-prospectus-en.pdf>

Please refer to the link below to access the sustainable finance disclosures of the Fund set out within the Annual Report of Vanguard Funds plc.

<https://fund-docs.vanguard.com/etf-annual-report.pdf>

Version Control

March 2025:

- Updates to the Section (a), (c) and (d) to reflect updates to the prospectus and pre-contractual disclosure wording effective 31 March 2025.

April 2023:

- Legal Entity Identifier (LEI) - The LEI has been updated to reflect the Fund's LEI, rather than the Investment Manager LEI.
- Section (e) 'Proportion of investments' – The question "What is the asset allocation planned for this product?" has been updated to provide enhanced clarity and to improve investor comparability of Article 8 products promoting environmental and/or social characteristics through an exclusionary screening only approach. This update is also reflected in '(a) Summary'.