

**Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:** R-Gestion Dynamic **Legal entity identifier:** 549300F7FBD744MEP844

**Environmental and/or social characteristics**

**Did this financial product have a sustainable investment objective?**

☒ ☐ **Yes**

☐ It made **sustainable investments with an environmental objective:** \_\_\_\_%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective:** \_\_\_\_%

☒ ☐ **No**

☒ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 60.9% 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 promoted E/S characteristics, but **did not make any sustainable investments**

**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.



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

This financial product has promoted both environmental and social (E/S) characteristics.

The financial product invests only in investment funds. The following characteristics apply to the financial product level and the information is derived from the target funds.

The environmental characteristics focused on promoting climate action. The financial product has targeted a net positive alignment (i.e. the difference between the alignment and the misalignment) higher than the net positive alignment of the broad market reference benchmark (which consists of: 5% FTSE 1 Month Eurodeposit EUR, 7% Bloomberg Euro Aggregate, 7% Bloomberg Global Aggregate EUR hedged, 3% ICE BofAML Global High Yield EUR hedged, 3% JP Morgan EMBI Global Diversified EUR hedged, 19% MSCI Europe NR, 45% MSCI World NR, 11% MSCI Emerging Markets NR) for each of the following Sustainable Development Goals (SDGs):

- SDG 7: Affordable and Clean Energy,
- SDG 13: Climate Action.

When investing in equity, this financial product aimed at achieving a carbon intensity that is at least 10% lower than the carbon intensity of the equity proportion of the broad market reference benchmark.

The social characteristics promoted focused on the protection of human needs. The financial product has targeted a net positive alignment on portfolio level, higher than the net positive alignment of the broad market reference benchmark, for the sum of the following SDGs:

- SDG 1: No Poverty,
- SDG 2: Zero Hunger,
- SDG 3: Good Health,
- SDG 6: Clean Water,
- SDG 11: Sustainable cities and communities, including safe and affordable housing.

The net alignment of the financial product with the SDGs as well as the carbon intensity were verified thanks to data provided by MSCI ESG.

Based on the data collected and analyzed, this financial product has achieved a net alignment of:

- 32.7% with the SDG 7, i.e. 8.8 percentage points more than the broad market reference benchmark
- 34.8% with the SDG 13, i.e. 6.8 percentage points more than the broad market reference benchmark
- 23% with the sum of SDGs 1, 2, 3, 6 and 11, i.e. 11.2 percentage points more than the broad market reference benchmark

The Carbon Intensity of the equity allocation, measured as scope 1 & 2 tons of CO<sub>2</sub> equivalents in relation to sales, was 61.4t CO<sub>2</sub>e/\$m sales. Compared with the values of the broad market reference benchmark of 124.7t CO<sub>2</sub>e/\$m sales, the intensity of the equity allocation is 50.8% lower.

At the fund level, the targeted investment funds needed to be classified either as Article 8 or as Article 9 under SFDR, and to showcase a clear ambition to contribute to these pressing sustainable challenges in their investment strategy and objectives.

#### ● **How did the sustainability indicators perform?**

The table below summarizes the different sustainability indicators used to measure the attainment of the E/S characteristics promoted:

Sustainability indicators	2024	Comments
<b>GENERAL INDICATORS</b>		
% of net assets aligned with the E/S characteristics promoted by this financial product	98%	Measured by the net assets that pass the qualitative assessment which is done by the Manager Selection team of our third party investment advisor in collaboration with dedicated independent ESG specialists. The ESG specialists have the final say.

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

% of investment funds aligned with the approach to evaluate good governance practices of investee companies	100%	All the funds respected the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the UN Global Compact. In addition, they demonstrated that they have adequate policies in place concerning engagement & voting
% of net assets that are in accordance with the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises (Principal Adverse Impact (PAI) 10)	100%	Based on MSCI ESG data
% of net assets that have no exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (PAI 14)	100%	Based on MSCI ESG data
% of net assets respecting the exclusion list	100%	Based on MSCI ESG data
<b>ENVIRONMENTAL</b>		
% of net assets with a positive net alignment with SDG 7, compared with the broad market reference benchmark	32.7% (8.8 percentage points more than the broad market reference benchmark)	Based on MSCI ESG data
% of net assets with a positive net alignment with SDG 13, compared with the broad market reference benchmark	34.8% (6.8 percentage points more than the broad market reference benchmark)	Based on MSCI ESG data
Carbon intensity of the equity allocation compared with the broad market reference benchmark	-50.8%  The equity allocation's Carbon Intensity (scope 1 & 2 CO2 equivalents per \$m sales) was 61.4t, compared to the benchmark's 124.7t.	Based on MSCI ESG data

SOCIAL		
% of net assets with a combined positive net alignment to the SDGs 1, 2, 3, 6 and 11, compared with the values of the broad market reference benchmark	23%  (11.2 percentage points more than the broad market reference benchmark)	Based on MSCI ESG data

● **...and compared to previous periods?**

The table below compares the performance of the sustainability indicators used to measure the attainment of the E/S characteristics promoted, for the reference periods 2023 and 2024:

Sustainability indicators	2023	2024	Comments
GENERAL			
% of net assets aligned with the E/S characteristics promoted by this financial product	99%	98%	In the previous period, we held 1% less Cash
% of investment funds aligned with the approach to evaluate good governance practices of investee companies	100%	100%	
% of net assets that are in accordance with the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises (Principal Adverse Impact (PAI) 10)	100%	100%	
% of net assets that have no exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (PAI 14)	100%	100%	
% of net assets respecting the exclusion list	100%	100%	

ENVIRONMENTAL			
% of net assets with a positive net alignment with SDG 7, compared with the broad market reference benchmark	N/A	32.7%  (8.8 percentage points more than the broad market reference benchmark)	This specification of the environmental characteristic was only added in May 2024 and was not included in the previous report. More details can be found in the summary of changes on our website <a href="#">under sustainability-related disclosures</a> .
% of net assets with a positive net alignment with SDG 13, compared with the broad market reference benchmark	N/A	34.8%  (6.8 percentage points more than the broad market reference benchmark)	This specification of the environmental characteristic was only added in May 2024 and was not included in the previous report. More details can be found in the summary of changes on our website <a href="#">under sustainability-related disclosures</a> .
Carbon intensity of the equity allocation compared with the broad market reference benchmark	-42.2%  The equity allocation's Carbon Intensity (scope 1 & 2 CO2 equivalents per \$m sales) was 79t, compared to the benchmark's 136.6t.	-50.8%  The equity allocation's Carbon Intensity (scope 1 & 2 CO2 equivalents per \$m sales) was 61.4t, compared to the benchmark's 124.7t.	The carbon intensity mainly improved because of the increasing exposure to the Paris-aligned JPM ETF. With only 33.1 tCO2e/\$m sales it is way below the average. And we recently increased Brown that is with 11 tCO2e/\$m even lower.
SOCIAL			
% of net assets with a combined positive net alignment to the SDGs 1, 2, 3, 6 and 11, compared with the values of the broad market reference benchmark	N/A	23%  (11.2 percentage points more than the broad market reference benchmark)	This specification of the social characteristic was only added in May 2024 and was not included in the previous report. More details can be found in the summary of changes on our website <a href="#">under sustainability-related disclosures</a> .

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

This financial product pursued both environmental and social objectives for the sustainable investments that it partially made, which apply to the financial product level rather than the fund level.

For the environmental sustainable investment objective, the financial product has focused on supporting climate action and therefore targeted a net positive alignment (i.e. the difference between the alignment and the misalignment) higher than the net positive alignment of the broad market reference benchmark for each of the following Sustainable Development Goals (SDGs):

- SDG 7: Affordable and Clean Energy,
- SDG 13: Climate Action.

When investing in equity, this financial product aimed at achieving a carbon intensity that is at least 10% lower than the carbon intensity of the equity proportion of the broad market reference benchmark.

Moreover, the financial product has targeted to invest a minimum of 1% in investment products aligned with the EU Taxonomy.

For the social sustainable investment objective, the product is focused on the protection of human needs. The financial product has targeted a net positive alignment on portfolio level, higher than the net positive alignment of the broad market reference benchmark, for the sum of the following SDGs:

- SDG 1: No Poverty,
- SDG 2: Zero Hunger,
- SDG 3: Good Health,
- SDG 6: Clean Water,
- SDG 11: Sustainable cities and communities, including safe and affordable housing.

● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

To ensure that the sustainable investments partially made by this financial product did not cause significant harm to any environmental investment objective, all mandatory indicators for adverse impacts were taken into account. The investments were also aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, as outlined below.

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

To ensure that the sustainable investments partially made by this financial product did not cause significant harm to any environmental investment objective, the Investment Manager has taken into account the fourteen mandatory PAI indicators and the two PAI indicators for investments in sovereigns and supranationals, which are:

**Principal adverse impacts** are the most significant negative impacts of decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Categories	#	PAI Indicators
<b>Greenhouse gas emissions</b>	1	GHG Emissions
	2	Carbon footprint
	3	GHG intensity of investee companies
	4	Exposure to companies active in the fossil fuel sector
	5	Share of non-renewable energy consumption and production
	6	Energy consumption intensity per high impact climate sector
<b>Biodiversity</b>	7	Activities negatively affecting biodiversity-sensitive areas
<b>Water</b>	8	Emissions to water
<b>Waster</b>	9	Hazardous waste and radioactive waste ratio
<b>Social and employee matters</b>	10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
	11	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
	12	Unadjusted gender pay gap
	13	Board gender diversity
	14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
<b>Environment (applicable to investments in sovereigns and supranationals)</b>	15	GHG intensity (applicable to investments in sovereigns and supranationals)
<b>Social (applicable to investments in sovereigns and supranationals)</b>	16	Investee countries subject to social violations (applicable to investments in sovereigns and supranationals)

During the fund selection process, the third party investment advisor checked if (request for information template) and how (qualitative check based on fund meetings and documentation) every fund did take the above-mentioned indicators into account. Subsequently, the PAI indicators were monitored at least once a year based on last reported EET Data, fund meetings and documentation.

In addition, the third party investment advisor has used the data from MSCI ESG for the different PAIs for monitoring purposes. These values were monitored and analyzed by the third party investment advisor and if any value was found particularly outstanding, the third party investment advisor would engage with the fund provider on these values to understand the reasons behind.

For the following PAIs, a strict exclusion was implemented, i.e. no targeted funds could be invested in these two categories:

- PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Where no reliable third-party data was available, the third party investment advisor made reasonable estimates or assumptions (MSCI ESG data has been used for all PAI indicators except PAI 1, for which data is unavailable).

During 2024, two cases of exposure to controversial weapons were identified and successfully resolved. The details are as follows:

During the second quarter, the Barings Global High Yield invested in Boeing. MSCI ESG associates Boeing with prohibited cluster munitions, and estimates that its revenue from weapons significantly exceeds 10%. We immediately engaged in discussions with Barings. They referenced Boeing's statement on their website, which denies exposure to banned weapons and claims a total revenue share from weapons of less than 5%. As an SEC-regulated company, Boeing would be liable for legal repercussions if this statement were false. While we understood Barings' reasoning, the investment in Boeing, undeniably one of the largest weapons manufacturers in the world, does not align with the spirit of our exclusion criteria. Accordingly, we replaced the fund during the third quarter as the fund stuck to the investment.

During the fourth quarter, the Goldman Sachs Emerging Markets Equity ESG had newly purchased the iShares MSCI Emerging Markets IMI ESG Screened ETF for efficient portfolio management reasons, which triggered a breach for controversial weapons, because of a reclassification by MSCI ESG of an index constituent. As the index on which the iShares ETF is based also excludes controversial weapons, this was corrected with the next rebalancing of the index. However, conventional weapons are not excluded from this index. We are currently in dialog with Goldman Sachs in this regard. However, the ETF has since been sold again in the currently known portfolio as of the reporting date, meaning that there are currently no violations.

No other investments were identified as having a critical and poorly managed impact in one of the considered PAIs areas.



— Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

To ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, the third party investment advisor checked during the fund selection process if and how these guidelines and principles were respected, but also screened the net assets on a monthly basis, for the following three data points in MSCI ESG, namely:

- UN Global Compact principles and OECD Guidelines for Multinational Enterprises. Considering the close link and overlap between the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, we conclude that the respect of the former also indicates an alignment with the latter.
- Companies in violation of the International Labour Organization's broader set of labor standards.
- Companies in violation of international norms around human rights.

No investments violated any of these principles or guidelines during 2024.



#### **How did this financial product consider principal adverse impacts on sustainability factors?**

All target funds excluded from their investments companies involved in the controversial arms trade (0% revenue threshold) and promoted adherence to the United Nations Global Compact principles.

The two cases involving Barings Global High Yield and the Goldman Sachs emerging Markets Equity ESG, which were flagged for violating the controversial weapons exclusion, have been addressed in the section titled “*How were the indicators for adverse impacts on sustainability factors taken into account?*”.

A questionnaire was completed by all target funds indicating whether they themselves consider principal adverse impacts on sustainability factors and, if so, which ones. MSCI ESG PAI data are used to look at the performance of each individual target fund per indicator, as well as aggregated at the overall portfolio level.



## What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is 2024.

Largest investments	Sector	% Assets	Country
<b>Comgest Growth Europe Plus I</b>	<b>Equity</b>	<b>10%</b>	<b>Europe</b>
<b>JPM Global REI SRI Paris-Aligned UCITS ETF EUR A</b>	<b>Equity</b>	<b>9%</b>	<b>Global</b>
<b>UBS (Irl) ETF MSCI World SRI UCITS ETF (USD) A-Acc</b>	<b>Equity</b>	<b>8%</b>	<b>Global</b>
<b>Brown Advisory US</b>	<b>Equity</b>	<b>8%</b>	<b>Global</b>
<b>Sustainable Growth C USD Acc</b>	<b>Equity</b>	<b>7%</b>	<b>EM</b>
<b>Vontobel Fund mtX Sust</b>	<b>Equity</b>	<b>7%</b>	<b>Global</b>
<b>Emerging Mkts Leaders I EUR</b>	<b>Equity</b>	<b>7%</b>	<b>Global</b>
<b>Liontrust GF Sustainable Future Global Growth A8</b>	<b>Equity</b>	<b>7%</b>	<b>Global</b>
<b>Lazard Global Equity Franchise C Acc EUR</b>	<b>Equity</b>	<b>6%</b>	<b>Europe</b>
<b>AAF Edentree European Sust Eqs I EUR Cap</b>	<b>Equity</b>	<b>5%</b>	<b>Global</b>
<b>AAF Boston Common US</b>	<b>Equity</b>	<b>4%</b>	<b>EM</b>
<b>Sustainable Eqs I EUR Cap</b>	<b>Equity</b>	<b>4%</b>	<b>Global</b>
<b>Goldman Sachs Em Mkts Eq ESG Pf I Acc EUR</b>	<b>Equity</b>	<b>4%</b>	<b>Global</b>
<b>Vontobel Fund GI Environ Change I EUR Acc</b>	<b>Bond</b>	<b>4%</b>	<b>EURO</b>
<b>Amundi Euro Government Green Bond UCITS ETF Acc</b>	<b>Equity</b>	<b>3%</b>	<b>Europe</b>
<b>MainFirst - Top European Ideas R</b>	<b>Bond</b>	<b>3%</b>	<b>Global</b>
<b>Aegon High Yield Global Bond Fund EUR Hdg B Acc</b>	<b>Bond</b>	<b>3%</b>	<b>EM</b>
<b>Vontobel Fund - Sust EM Debt HI (hedged) EUR</b>			

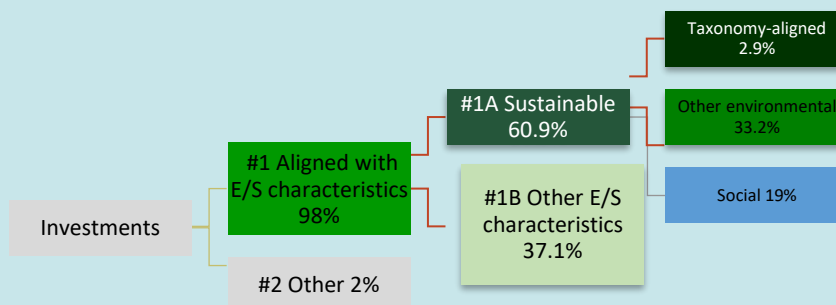


## What was the proportion of sustainability-related investments?

The proportion of sustainability-related investments was 60.9%.

**Asset allocation** describes the share of investments in specific assets.

### What was the asset allocation?



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

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

On a look-through basis 98% of the net assets was aligned with the E/S characteristics promoted (#1 Aligned with E/S characteristics). From this, 60.9% was considered as sustainable investments (#1A Sustainable), and more specifically 2.9% was aligned with the EU Taxonomy, 33.2% was aligned with the environmental sustainable investment objective and 19% was aligned with the social sustainable investment objective.

The taxonomy-aligned, environmental and social sustainable investments might not add up, as we now rely exclusively on reported data. Some funds report over 100% when summing Sustainable Investments Environmental and Sustainable Investments Social, as they include certain securities in both segments. Others indicate Sustainable Investments but leave the sub-fields blank.

The remaining (#2 Other), representing 2% of the net assets, was invested in cash and bonds for liquidity and diversification purposes.

● **In which economic sectors were the investments made?**

The investments were made in the following economic sectors:

Breakdown by Sectors	Portfolio
Information Technology	17.2%
Financials (ex Real Estate)	13.2%
Health Care	10.4%
Industrials	11.1%
Consumer Discretionary	9.2%
Consumer Staples	3.2%
Telecommunication	4.4%
Materials	3.5%
Utilities	2.6%
Real Estate	1.8%
others	1.1%
Energy	0.3%
<b>Total equities in portfolio</b>	<b>78%</b>

The remaining 22% were held in cash and by target funds invested in non-allocable assets such as cash, bonds, alternative investments, commodities and gold.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

According to the reported data from the asset managers of the funds, this financial product had 2.9% of its net assets aligned with the EU Taxonomy.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup> ?**

☐

Yes:

☐

In fossil gas

☐

In nuclear energy

☒

No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

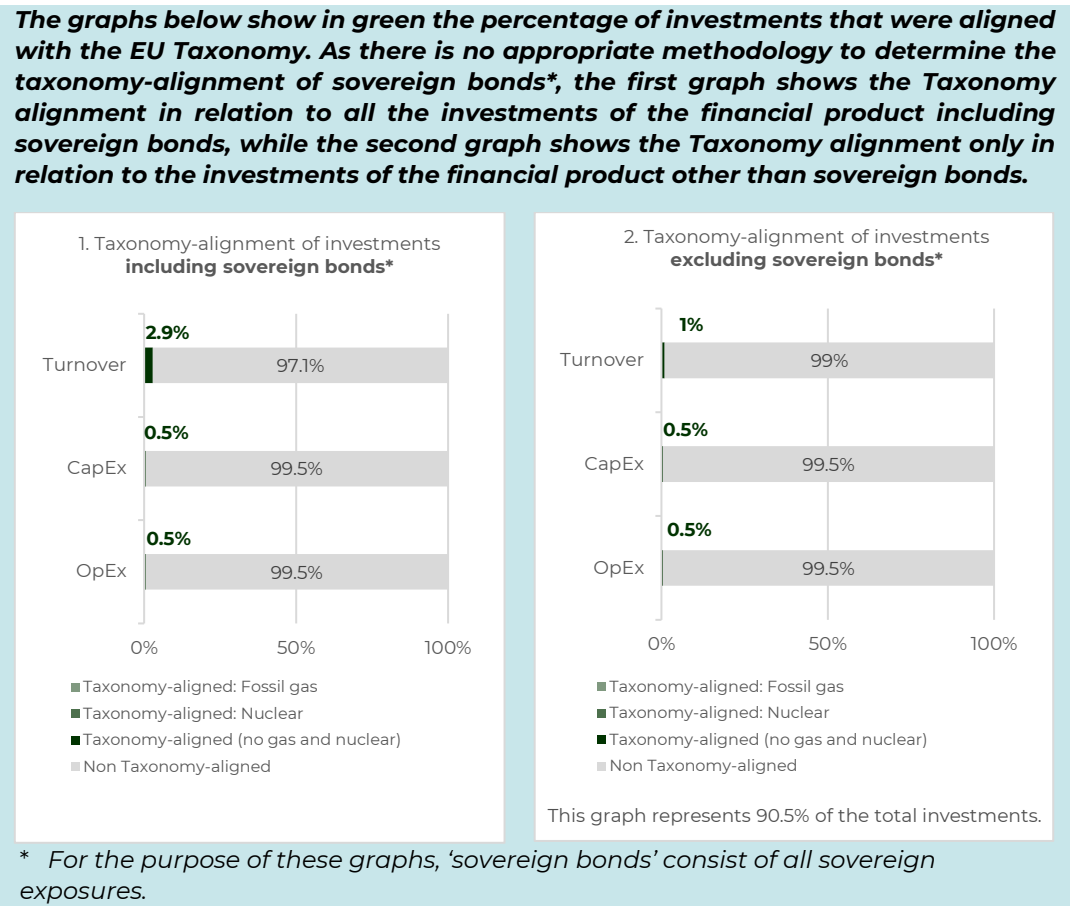
**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

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

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



● **What was the share of investments made in transitional and enabling activities?**

The share of investments made in transitional and enabling activities was as follows:

Activities	Investment share
Transitional	0%
Enabling	0.16%

These values are low as the transitional and enabling activities under the EU Taxonomy are hardly reported by investment funds, and there is still a lack of data.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

The following table summarizes the percentage of investments aligned with the EU Taxonomy compared with the previous reference period:

	Year 2023	Year 2024
<b>% of investments aligned with the EU Taxonomy</b>	6%	2.9%

Between 2023 and 2024, there has been a drop of 3.1% in the alignment with the EU Taxonomy.

The figures are not directly comparable, as last year we relied on MSCI ESG data, whereas this year we used figures provided by fund providers in their Annual Reports.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy was 33.2%.

As the Taxonomy covers only a portion of the possible environmental sustainable objectives and funds often take a conservative approach to measuring the Taxonomy alignment of their investments, we have as well a significant portion of sustainable investments with an environmental objective that are not aligned with the Taxonomy.



**What was the share of socially sustainable investments?**

The share of sustainable investments with a social objective was 19%.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

2% of the portfolio were included under “other”.

2% of it was cash that served both as a tactical tool to control the level of investment of clients, but also as an account from which deposits and withdrawals were made into the strategy, as well as fees were paid.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

The binding elements of the investment strategy, defined in the precontractual template of this financial product, have been monitored throughout the reference period to ensure the attainment of the E/S characteristics promoted. More specifically, the following actions have been taken:

**ESG Integration** : the third party investment advisor has ensured that all selected underlying funds integrate ESG criteria in the security selection and valuation process.

**Norms based exclusions**: the third party investment advisor has verified and monitored that all selected underlying funds are aligned with the UN Global Compact, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and

Human Rights, including ILO Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**Exclusions:** the investent advisor has checked that all selected underlying funds follow the hard and soft exclusion policy.

Thus, investment funds had to exclude from their investments companies that are involved in the following activities (hard exclusions) or have no exposure to them:

- Controversial weapons (revenue limit 0%).
- Nuclear weapons (revenue limit 0%).
- Military conventional weapons (revenue limit 10%).
- Tobacco (5% revenue threshold on producers, 15% revenue threshold on distributors).
- Thermal coal (10% revenue threshold).
- UN Security Council Sanctions & High Risk Jurisdictions subject to a “Call for Action” identified by the FATC.

In addition to the hard exclusion policy, the following exposures and related soft exclusion policies (exclude or explain) have been analyzed for every fund:

- Coal power generation (revenue limit 10%).
- Nuclear power generation (revenue limit 10%).
- Companies that own high impact fossil fuel reserves (revenue limit 10%).
- Gambling facility operators (revenue limit 10%).
- Alcohol producers (revenue limit 10%).

During the first quarter, it came to light that the fund JPM Global Select had bought Honeywell in February, which has a revenue share of almost 10% in nuclear weapons and over 10% in weapons overall. This contradicts the exclusion criteria of the mandate. Engagement measures were immediately initiated with the fund management and JP Morgan's sustainability team. As the fund stuck to the investment, the fund was replaced during the second quarter.

The two other cases where funds that did not respect our exclusion criteria, involving the Barings Global High Yield and the Goldman Sachs Emerging Markets Equity ESG, which were flagged for violating the controversial weapons exclusion, have been addressed in the section titled “*How were the indicators for adverse impacts on sustainability factors taken into account?*”.

No other investments were identified as having violated our exclusion criteria.

**Engagement & voting:** Every fund was able to demonstrate that they have adequate policies in place concerning engagement and voting.

In addition, the third party investment advisor engaged with all the aforementioned funds that showed exposure to any applied exclusions.

The third party investment advisor was also in contact with all target funds during the reporting period to review SFDR specific metrics and reports. This included actively pointing out missing or incorrectly presented data.



### **How did this financial product perform compared to the reference benchmark?**

No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

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