

LUX IM – VONTOBEL GLOBAL EQUITY (“Sub-fund”)

Sustainability-related disclosures required for Article 8 financial products under the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector

Section	Disclosure
No sustainable investment objective	The Sub-fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.
Environmental or social characteristics of the financial product	<p>The Sub-fund is a feeder structure following Art. 77 of the UCI Law. It invests at least 85% of its net assets in shares of Vontobel Fund – Global Equity (the "Master UCITS"). The Master UCITS is a sub-fund of Vontobel Fund, an open-ended investment company with variable capital set forth in a form of an umbrella fund, incorporated in Luxembourg, and authorized as an undertaking for collective investment in transferable securities pursuant to the part I of the UCI Law.</p> <p>The below information refers to environmental and social characteristics pursued by of the Master UCITS.</p> <p>The Master UCITS promotes environmental and social characteristics and invests in issuers that the Investment Manager considers well-prepared to handle financially material environmental and social challenges. Issuers will be selected based on the Investment Manager’s ESG framework.</p>
Investment strategy	<p>The Sub-fund is a feeder structure following Art. 77 of the UCI Law. It invests at least 85% of its net assets in shares of Vontobel Fund – Global Equity (the "Master UCITS").</p> <p>The Master UCITS promotes environmental and social characteristics and invests in issuers that the Investment Manager considers well-prepared to handle financially material environmental and social challenges. Issuers will be selected based on the Investment Manager’s ESG framework.</p> <p>In order to attain the environmental and social characteristics, the Master UCITS applies the following ESG framework: exclusions, monitoring of severe controversies, carbon related commitments. The securities will be analyzed based on the binding elements prior to investment and monitored on a continuous basis.</p> <p>Target investments of the Master UCITS are subject to the following sustainability indicators, in order to assess their eligibility for investment by the Sub-fund and thus to measure the attainment of the pursued environmental and social characteristics.</p> <ul style="list-style-type: none"> ▪ Negative screening: exclusion of target issuers involved in controversial conduct and/or activities; ▪ Positive Screening: carbon related commitment ▪ Consideration of principal adverse impacts (PAI) <p>The Investment Manager will assess investee companies’ good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance, by applying a severe controversies monitoring process.</p>
Proportion of investments	<p>The Master UCITS will invest at least 67% of its net assets in investments that are aligned to the promoted environmental and social characteristics.</p> <p>The Sub-fund will be invest at least 85% of its net assets in the Master UCITS. As a consequence the minimum proportion of the Sub-fund’s net assets invested in assets aligned to the promoted environmental and social characteristics is 57%</p> <div style="text-align: center; margin: 20px 0;"> <pre> graph LR A[Investments] --- B["#1 Aligned with E/S characteristics Min 57%"] A --- C["#2 Other"] </pre> </div> <p>The Sub-fund may invest up to 15% of its net assets in cash for liquidity purposes and derivatives for hedging purposes. The remaining investments of the Master UCITS (“#2 Other”) may be invested in cash and cash equivalents for liquidity purposes, derivatives which may be used for hedging purposes, or unscreened investments for diversification purposes or investments for which ESG data is lacking. No minimum environmental or social safeguards are applied.</p>
Monitoring of environmental or social characteristics	<p>In order to attain the promoted environmental and social characteristics, the eligibility of Master UCITS’ target issuers is assessed based on the following binding elements:</p> <ul style="list-style-type: none"> ▪ Negative screening (severe controversies and specific activities) ▪ Positive Screening (carbon related commitment based on Scope 1 and Scope 2 greenhouse gas emissions intensity compared to the one of the investment universe) ▪ PAI consideration (emissions, biodiversity, social matters and human rights)
Methodologies for environmental or	<p>In order to attain the promoted environmental and social characteristics, the eligibility of target investments is assessed based on the negative screening, Positive screening and PAI consideration procedures.</p>

Section	Disclosure
social characteristics	Internal controls are in place in respect of investment decision making for the Master UCITS. These include, but are not limited to, pre-trade and post-trade controls to ensure all applicable binding elements are observed at all times and independent oversight by risk management functions as required.
Data sources and processing	The Investment Manager leverages ESG data from various external data providers and directly from the issuers. The Investment Manager may make reasonable estimates, when data is lacking. Additionally, third party ESG data provider may use estimates themselves. In order to ensure data quality, the Investment Manager regularly reviews data; uses multiple data sources.
Limitations to methodologies and data	The limitations to methodologies and data may refer to the incomplete or inaccurate data. In order to maintain confidence that social and environmental characteristics are met, the investment manager may also engage with investees in order to fill data gaps or may use complimentary data from additional providers or directly from investee disclosures. However such limitations are not deemed material in terms of effect on the attainment of the environmental or social characteristics promoted by the Sub-fund.
Due Diligence	In order to qualify for initial investment, the target investments must comply with the binding elements applied by the Sub-fund. This compliance has to be ensured by the Investment Manager through pre-trade compliance mechanism in place
Engagement Policies	This section is not applicable, as the Sub-fund is not deploying an ESG engagement strategy for the attainment of the promoted environmental or social characteristics.
Designated reference benchmark	No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.