

LUX IM – ESG AMBIENTA INFRASTRUCTURE INCOME (“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	<p>The Sub-fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.</p> <p>The Sub-fund will allocate a minimum of 30% of its assets in sustainable investments in accordance with Article 2 (17) SFDR. The Sub-fund is considering the EU criteria for environmentally sustainable economic activities as defined under the EU Taxonomy Regulation.</p> <p>The Sub-fund’s sustainable investments are composed by environmentally sustainable (“ES”) investments. This is measured, at position level, by the Ambianta Sustainability Index (ASI), a proprietary analytical assessment framework. At Sub-fund level this is achieved by ensuring that the weighted average ASI of investments is greater than or equal to 25%. Investments will exclude cash and cash equivalents.</p>
Environmental or social characteristics of the financial product	<p>The Sub-fund invests in securities of issuers that contribute to the Sub-fund’s promoted environmental characteristics, including environmentally sustainable (ES) investments. This is achieved through the implementation of binding environmental sustainability and Environmental, Social and Governance (“ESG”) criteria with a focus on companies involved in sectors and/or activities which may benefit from competitive advantage driven by environmental sustainability trends, including in particular the development and/or exploitation of sustainable infrastructures and the improvement of Resource Efficiency and/or Pollution Control.</p> <p>This is measured, at position level, by the Ambianta Sustainability Index (ASI), a proprietary analytical assessment framework. At Sub-fund level this is achieved by ensuring that the weighted average ASI of investments is greater than or equal to 25%. Investments will exclude cash and cash equivalents.</p>
Investment strategy	<p>The Sub-fund aims to generate attractive returns, through capital appreciation and income, by implementing a diversified and flexible allocation to multiple asset classes. The portfolio allocation will be dynamically adjusted with the aim to reduce downside risk and seek out profitable investment opportunities across asset classes. The security selection process is based on the investment manager’s ongoing analysis of the target issuers’ financial fundamentals as well as binding environmental sustainability and Environmental, Social and Governance (“ESG”) criteria with a focus on companies involved in sectors and/or activities which may benefit from competitive advantage driven by environmental sustainability trends, including in particular the development and/or exploitation of sustainable infrastructures, such as but not limited to energy and water utility infrastructures and the improvement of Resource Efficiency and/or Pollution Control.</p> <p>The Sub-fund, in order to fulfil the sustainable investment objective and to generate capital appreciation and income, will make use of a range of financial instruments. These will include equity and debt securities issued by the selected companies, as well as long and short positions in derivatives (mainly equity swaps, futures, and vanilla call and put options on equity underlyers). Derivatives may be used for investment purposes or for efficient portfolio management. The allocation to cash and cash equivalent instruments in the Sub-fund may vary in order to manage risk.</p> <p>Target investments 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; ▪ Sustainable Investments and Positive Screening; ▪ Consideration of principal adverse impacts (PAI) <p>During the due diligence phase and afterwards through monitoring, as per the ESG in Action programme, the Investment Manager aims to ensure that investee companies operate in compliance with the best practices of business conduct and integrity, with particular reference to sound management structures, relations with staff, staff remuneration and compliance with tax obligations.</p>
Proportion of investments	<p>The Sub-Fund will invest at least 50% of its net assets in investments that are aligned to the promoted environmental and/or social characteristics and a minimum of 30% of its net assets in sustainable investments with an environmental objective. Sustainable investments include both Taxonomy-aligned ones and other environmental sustainable investments.</p> <p>To classify investments as sustainable, the Manager applies its proprietary methodology. Target issuers are analysed using the Ambianta Sustainability Index (“ASI”) framework, which assigns a number between -100% and 100% based on the contribution to Resource Efficiency and Pollution Control of each individual company and thereby its contribution to environmental sustainability and related trends. The ASI is calculated as the weighted average of the positive or negative environmental contribution of each division, based on enterprise value. The Sub-fund excludes target issuers that do not meet the threshold of ASI ≥0%. A target issuer that passes the minimum ASI threshold is considered as sustainable in its entirety.</p> <p>The remaining investments of the Sub-fund (“#2 Other”) may include (i) ancillary cash and cash equivalents for liquidity purposes within the limits prescribed by applicable laws, (ii) derivatives which may be used for hedging and investment purposes as per the applicable provisions of the Investment Policy of the Sub-fund; (iii) investments in securities of target issuers which are not aligned with the promoted environmental or social characteristics and may be used within the Sub-fund’s investment objective of generating attractive returns. In all relevant circumstances minimum safeguards are integrated in the analysis to ensure the delivery of its overall sustainable investment</p>

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	<p>objective: i) they are analysed as part of the investment due diligence phase through an assessment and ii) during the management phase through targeted monitoring activities.</p> <pre> graph LR Investments --> N1["#1 Aligned with E/S characteristics Min 50%"] Investments --> N2["#2 Other"] N1 --> N1A["#1A Sustainable Min. 30%"] N1 --> N1B["#1B Other E/S characteristics"] N1A --> N1A1["Taxonomy-aligned"] N1A --> N1A2["Other environmental"] </pre>
Monitoring of environmental or social characteristics	<p>The Investment Manager integrates the ESG analysis within the following investments selection processes:</p> <ul style="list-style-type: none"> ▪ Negative screening (severe controversies and specific activities, e.g. controversial and nuclear weapons; conventional weapons; adult entertainment; coal; tobacco; gambling); ▪ Sustainable investments and Positive screening (target issuers are analysed using the ASI, which represents in one figure, between -100% and 100%, the contribution to Resource Efficiency and Pollution Control. The Sub-fund will invest in target issuers that meet the Ambients Sustainability Index threshold (≥0%), naturally excluding many businesses beyond any restricted activities lists based purely on sector.) ▪ PAI consideration
Methodologies for environmental or social characteristics	<p>In order to attain the promoted environmental and social characteristics, the eligibility of target issuers is assessed based on a Negative screening; Sustainable investments and Positive screening and consideration of principal adverse impacts.</p> <p>Internal controls are in place in respect of investment decision making for the Sub-fund. 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.</p>
Data sources and processing	<p>The data and information useful for the application of the ASI are collected during due diligence and periodically over the duration of the investment, by the Sustainability & Strategy team with the support of the investment team. The data and information necessary is obtained from a range of sources, with the aim of guaranteeing completeness and quality of information.</p>
Limitations to methodologies and data	<p>The limitations to the attainment of the promoted environmental and social characteristics are deemed non-material for the attainment of the environmental or social characteristics promoted by the Sub-fund.</p>
Due Diligence	<p>In order to qualify for initial investment, the 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.</p>
Engagement Policies	<p>During the holding period Ambients will continue monitoring negative impacts through a combination of proprietary tools and external market research analysis, which are subsequently factored into investment decisions and in implementing Ambients's engagement and active ownership practices..</p>
Designated reference benchmark	<p>No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.</p>