

LUX IM – ESG SYCOMORE EUROPEAN EQUITIES (“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 50% of its assets in sustainable investments in accordance with Article 2 (17) SFDR.</p> <p>The Sub-fund will partially make sustainable investments with a social objective, based on at least one of the following criteria as measured by proprietary metrics:</p> <ul style="list-style-type: none"> • On the societal side: investments with a Societal Contribution of products and services above or equal to +30%. Companies associated with a Societal Contribution above or equal to the selected threshold make a significant contribution to one or several of SDGs or the SDG’s targets. • On the human capital side: <ul style="list-style-type: none"> o Investments with a Good Jobs Rating above or equal to 55/100 o Investments with a Happy@Work Environment rating above or equal to 4.5/5. <p>Companies associated with a Good Jobs Rating or a Happy@Work Environment rating above or equal to the selected thresholds therefore make a significant contribution to SDG 8.</p> <p>The Sub-fund will partially make sustainable investments with an environmental objective, based on the following criterion based on a proprietary metric: investments with a Net Environmental Contribution (NEC) above or equal to +10%. Companies associated with a NEC above or equal to the selected threshold therefore make a significant contribution to the ecological transition and the climate change mitigation objectives</p>
Environmental or social characteristics of the financial product	<p>The Sub-fund seeks capital appreciation through investments in equity securities, with a Socially Responsible Investment (SRI) process. The Sub-fund focuses on themes such as energy transition, management of sustainable resources, health and protection, nutrition and well-being, digital and communication.</p>
Investment strategy	<p>The Sub-fund seeks capital appreciation through investments in equity securities which the Investment Manager believes are attractive in providing long-term capital growth and compliant with the SRI process.</p> <p>The Sub-fund essentially invests in fully paid equity securities issued by companies listed on stock exchanges (qualifying as Regulated Markets). The Sub-fund will have a direct and indirect exposure of at least 75% of its net assets to equity securities issued by companies listed on stock exchanges of any European country. Direct and indirect exposure to equity securities issued by non-European companies will not exceed 25% of the Sub-fund’s net assets. The Sub-fund is totally unconstrained in terms of market capitalization of securities.</p> <p>The Investment Manager integrates the ESG analysis within the investments’ selection process, as follows: ESG (Environment, Social and Governance) analysis, being simultaneously and fully integrated into the investment process, is conducted through the Investment Manager (Sycomore Asset Management)’s proprietary “SPICE” methodology. This methodology leads to a SPICE rating from 1 to 5 (5 being the highest rate).</p> <p>The Sub-fund selection criteria “net environmental contribution, societal contribution of products and services, good jobs rating, percentage of women in key management roles, and influence & proactivity” contribute analyzing a company’s exposure and/or contribution to the United Nations Sustainable Development Goals (SDGs).</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"> ▪ A filter of exclusion: exclusion of target issuers involved in controversial conduct and/or activities; ▪ A filter of selection: investment in companies that contribute to the environmental and social objectives pursued by the Sub-fund. ▪ Consideration of principal adverse impacts (PAI) <p>Governance is part of the SPICE analysis, including a dedicated governance section within the “I” section involving a significant focus on management structures, and governance items embedded into the other parts of the analysis framework.</p>
Proportion of investments	<p>The Sub-Fund will invest at least 90% of its net assets in investments that are aligned to the promoted environmental and/or social characteristics. (# 1). The minimum proportion of sustainable investments is 50% (#1A) of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 1% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 1% have a social objective.</p> <p>To classify as sustainable investments, target issuers meet minimum thresholds on the below proprietary metrics:</p> <p><u>Sustainable investments with a social objective:</u> based on at least one of the following criteria:</p> <ul style="list-style-type: none"> • On the societal side: Societal Contribution of products and services above or equal to +30%. • On the human capital side: <ul style="list-style-type: none"> o Good Jobs Rating above or equal to 55/100 o Happy@Work Environment rating above or equal to 4.5/5. <p><u>Sustainable investments with an environmental objective:</u> NEC above or equal to +10%</p> <p>A target issuer that passes such minimum thresholds is considered as sustainable in its entirety.</p>

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	<p>Investments included under “#2 Other” relate to derivatives used for hedging purpose, to cash held as ancillary liquidity or to cash equivalent such as sovereign bonds.</p> <p>Bonds, other international debt securities and short-term negotiable securities from public issuers are selected through an in-house rating of the issuing State strictly above 2.5 on a scale of 5 (5 being the highest rate), the State being thus considered as sufficiently sustainable and inclusive.</p> <p>Cash and derivatives held for hedging purpose, by nature, are not subject to any minimum environmental or social safeguards.</p>
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"> ▪ A filter of exclusion: exclusion of target issuers involved in controversial conduct and/or activities; ▪ A filter of selection: investment in companies that contribute to the environmental and social objectives pursued by the Sub-fund. <p>The following binding elements are used to select investments to attain the characteristics promoted:</p> <ul style="list-style-type: none"> ▪ A filter of selection: based on their qualification as sustainable through their product and services (measured through minimum threshold on proprietary metrics Net Environmental Contribution (NEC) or Societal contribution of products and services) or their practices (measured through minimum threshold on proprietary metrics Net Environmental Contribution (NEC) or Societal contribution of products and services (measured through minimum threshold on proprietary metrics Good Jobs Rating or Gender Diversity or Society pillar of SPICE) ▪ A filter of exclusion: based on the SRI exclusion policy adopted by Sycomore or the SPICE rating (equal or below 3/5) or a level 3/3 controversy; and a rating below 3/5 in the business model sub segment of the Investors pillar of SPICE.
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 filter of exclusion, a filter of selection 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 sources used to attain the stated environmental and social characteristics is obtained from internal research activity complemented with external research and data from specialised external providers or directly provided by the issuers. All data is aggregated in in-house ESG scoring methodology “SPICE”.</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>The Investment Manager operates engagement policies that are about encouraging companies to improve their sustainability practices over the long term by suggesting areas for improvement as part of a constructive dialogue and long-term monitoring process</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>