

## Reports on the promotion of environmental and social characteristics of funds in 2024

ERGO Unit Link insurance is a financial product that promotes environmental and/or social features, and the promotion of these features means that ERGO Unit Link insurance product invests at least into one light green fund and holds at least one of the light green funds for the entire period of the financial product validity.

More information on the environmental and/or social characteristics of each light green fund (according to Article 8 of the SFDR) is provided below in each funds periodic report for 2024.

The following pages provide information about the light green funds offered by ERGO in the original language (English).

Attached are the 2024 reports of the following funds:

Direction name	ISIN code	Fund name
Bonds	LU0368229703	BGF Euro Bond I2
Global ESG Equity Index	LU1615092217	BNPP MSCI World SRI PAB ETF
Europe Equity	IE00BHWQNP08	Comgest Growth Europe Smaller Companies I
Short-term Bonds	FI0008804463	Evli Euro Liquidity B
Global Equity	FI4000301312	Evli Global IB
Global Emerging Markets Equity	LU0602539271	Nordea 1 - Emerging Sustainable Stars Equity BI
Asia Equity	LU0248183658	Schroder ISF Asian Opportunities C
US Equity	LU1737526100	T. Rowe Price US Smaller Companies Equity Q1
Europe Emerging Markets Equity	LU1687402393	Trigon New Europe A

Product name: Euro Bond Fund

Periodic disclosure for 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

**Euro Bond Fund** 

### 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## **Environmental and/or social characteristics**

Legal entity identifier: 549300KZI1OJWARMMP28



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 (continued)

#### **Euro Bond Fund (continued)**



### Sustainability

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

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

The following table lists the environmental and social characteristics which were promoted by the Fund throughout the reference period. Further information on these environmental and social characteristics is outlined in the Fund's prospectus. Please refer to the section below, "How did the sustainability indicators perform?", which provides information about the extent that the Fund met such environmental and social characteristics.

### Environmental and social characteristics promoted by the Fund

Improvement of ESG adjusted score relative to the Bloomberg Euro-Aggregate Index (80%) and Bloomberg Global Aggregate Index (20%)

Investments in issuers deemed to have positive externalities

Limiting investments in issuers deemed to have negative externalities

Exclusion of issuers which are engaged in, or are otherwise exposed to, the production of controversial weapons (including, but not limited to, cluster munitions, biological-chemical, landmines, depleted uranium, blinding laser, non-detectable fragments and/or incendiary weapons)

Exclusion of issuers deriving any revenue from direct involvement in the production of nuclear weapons or nuclear weapon components or delivery platforms, or the provision of auxiliary services related to nuclear weapons

Exclusion of issuers deriving more than 5% of their revenue from thermal coal extraction and/or thermal coal-based power generation, with the exception of "green bonds", that are considered to comply with the International Capital Markets Association's Green Bond Principles, from such issuers

Exclusion of issuers deriving more than 5% of their revenue from the production and generation of tar sands (also known as oil sands)

Exclusion of issuers which produce tobacco products

Exclusion of issuers which derive more than 5% of their revenue from the production, distribution, retail and supply of tobacco-related products

Exclusion of issuers which produce firearms and/or small arms ammunition intended for retail to civilians

Exclusion of issuers which derive more than 5% of their revenue from the distribution (wholesale or retail) of firearms and/or small arms ammunition intended for civilian use

Exclusion of issuers which have been deemed to have failed to comply with UN Global Compact Principles (which cover human rights, labour standards, the environment and anticorruption)

Ensure that more than 90% of the issuers of securities in which the Fund invests (excluding money market funds) shall be ESG rated or have been analysed for ESG purposes

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 (continued)

**Euro Bond Fund (continued)** 

### How did the sustainability indicators perform?

The following table provides information about the performance of the sustainability indicators used to measure the attainment of each of the environmental and social characteristics promoted by the Fund, as further detailed in the Fund's prospectus.

Sustainability Indicator	Metric	2024	2023
Investments in issuers deemed to have positive externalities	Investments deemed to have higher positive externalities held by the Fund as compared to the ESG Reporting Index	15.99%	N/A <sup>1</sup>
Improvement of ESG adjusted score relative to the Bloomberg Euro-Aggregate Index (80%) and Bloomberg Global Aggregate Index (20%)	ESG score % improvement relative to the benchmark	3.33%	N/A¹
Limiting investments in issuers deemed to have negative externalities.	# of active breaches	No active breaches	N/A <sup>1</sup>
Ensure that more than 90% of the issuers of securities in which the Fund invests (excluding money market funds) shall be ESG rated or have been analysed for ESG purposes	% of issuers with an ESG rating	Greater than 90% of issuers	N/A <sup>1</sup>
Exclusion of issuers based on exclusionary criteria as defined in table above Environmental and social characteristics promoted by the Fund	# of active breaches	No active breaches	N/A <sup>1</sup>

<sup>1</sup>As this is the first reference period presented for the Fund, no comparatives are presented.

### ...and compared to previous periods?

The above table provides information about the performance of the sustainability indicators for the previous reference period (see section "How did the sustainability indicators perform?").

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 (continued)

**Euro Bond Fund (continued)** 

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 section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio.

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

This section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio.

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

This section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio. Please refer to the section below, "How did this financial product consider principal adverse impacts on sustainability factors?", which describes how the Fund considered PAIs on sustainability factors.

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

This section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio.

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 EU criteria.

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

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

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

**Principal adverse** 

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 (continued)

Euro Bond Fund (continued)



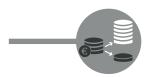
### How did this financial product consider principal adverse impacts on sustainability factors?

The following table provides information about the impact of the principal adverse sustainability indicators taken into consideration by this Fund. The Fund considered the impact of the principal adverse sustainability indicators through the promotion of environmental and social characteristics ("E&S criteria") set out above (see To what extent were the environmental and/or social characteristics promoted by this financial product met?). The Investment Adviser has determined that these PAIs have been considered as part of the investment selection criteria. The Fund's specific sustainability indicator may not align with the full scope of the regulatory definition of the corresponding PAI outlined in Annex 1 supplementing Regulation (EU) 2019/2088 Regulatory Technical Standards ("RTS").

Adverse Sustainability Indicator	Sustainability Indicators
GHG emissions	Limiting investments in issuers deemed to have negative externalities
GHG intensity of investee companies.	Limiting investments in issuers deemed to have negative externalities
Exposure to companies active in the fossil fuel sector	Exclusion of issuers deriving more than 5% of their revenue from thermal coal extraction and/or thermal coal-based power generation, with the exception of "green bonds", that are considered to comply with the International Capital Markets Association's Green Bond Principles, from such issuers.
Exposure to companies active in the fossil fuel sector	Exclusion of issuers deriving more than 5% of their revenue from the production and generation of tar sands (also known as oil sands).
Energy consumption intensity per high impact climate sector	Limiting investments in issuers deemed to have negative externalities
Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Issuers which have been deemed to have failed to comply with UN Global Compact Principles (which cover human rights, labour standards, the environment and anticorruption).
Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	
Exposure to controversial weapons (anti personnel mines, cluster munitions, chemical weapons and biological weapons)	Exclusion of issuers which are engaged in, or are otherwise exposed to, the production of controversial weapons (including, but not limited to, cluster munitions, biological-chemical, landmines, depleted uranium, blinding laser, non-detectable fragments and/or incendiary weapons).

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 (continued)

### **Euro Bond Fund (continued)**

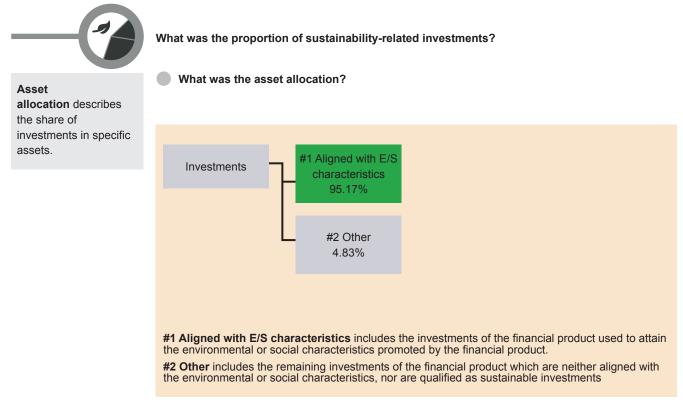


The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: From 1 September 2023 to 31 August 2024. What were the top investments of this financial product?

	0	0/	0
Largest investments	Sector	% Assets	•
BLK LEAF Fund Agency Acc T0 Eur	Finance Companies	4.90%	Ireland
Italy (Republic Of) 2035-04-30	Treasuries	2.00%	Italy
France (Republic Of) Regs 2026-02-25	Treasuries	1.57%	France
France (Republic Of) Regs 2028-02-25	Treasuries	1.43%	France
France (Republic Of) Regs 2027-02-25	Treasuries	1.18%	France
Germany (Federal Republic Of) Regs 2042-07-04	Treasuries	1.10%	Germany
France (Republic Of) Regs 2029-02-25	Treasuries	1.10%	France
Italy (Republic Of) 2053-10-01	Treasuries	1.09%	Italy
Spain (Kingdom Of) 2027-01-31	Treasuries	1.09%	Spain
Spain (Kingdom Of) 2034-10-31	Treasuries	1.08%	Spain
European Financial Stability Facil Mtn Regs 2027-05-03	Government Related	1.07%	Supranational
Spain (Kingdom Of) 2024-10-31	Treasuries	1.04%	Spain
Germany (Federal Republic Of) Regs 2033-02-15	Treasuries	1.03%	Germany
Spain (Kingdom Of) 2029-07-30	Treasuries	1.02%	Spain
Netherlands (Kingdom Of) 2027-07-15	Treasuries	0.92%	Netherlands

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 (continued)

**Euro Bond Fund (continued)** 



The Fund did not commit to holding Sustainable Investments and therefore the Fund's exposure to Sustainable Investments has not been assessed, however, during the reference period, a percentage of the Fund's investments were aligned with the EU Taxonomy (see the section "To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?" below).

## 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 (continued)

### **Euro Bond Fund (continued)**

The following table details the asset allocation of the Fund for the current and the previous reference period.

Asset allocation	% Investme	% Investments	
	2024	2023	
#1 Aligned with E/S characteristics	95.17%	N/A <sup>1</sup>	
#2 Other	4.83%	N/A <sup>1</sup>	

<sup>1</sup>As this is the first reference period presented for the Fund, no comparatives are presented.

#### In which economic sectors were the investments made?

The following table details the economic sectors the Fund was exposed to during the reference period.

Sector	Sub-Sector	% of Investments
Treasuries	Treasuries	40.45%
Securitized	Covered	13.92%
Banking	Banking	9.78%
Government Related	Agency	7.94%
Government Related	Supranational	5.35%
Finance Companies	Finance Companies	4.90%
Securitized	ABS	3.40%
Government Related	Local Authority	3.24%
Government Related	Sovereign	1.67%
Consumer Non-Cyclical	Pharmaceuticals	1.13%
Energy	Integrated	0.85%
Energy	Midstream	0.23%

During the reference period, none of the Fund's investments were held in the following sub-sectors (as defined by the Barclays Industry Classification System): independent, oil field services, refining, or metals and mining.

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 (continued)

#### **Euro Bond Fund (continued)**

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.

## Taxonomy-aligned activities are expressed as a share of: - **turnover** reflecting the share of revenue from green activities of investee companies. - **capital expenditure** (CapEx) showing the green

investments made by investee companies, e.g. for a transition to a green economy. - operational expenditure (OpEx) reflecting green operational activities of investee companies.



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

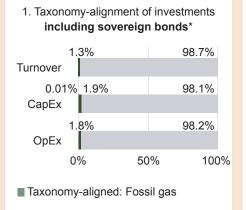
For the reference period, the Fund's investment alignment with EU Taxonomy is shown in the graphs below.

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

Х	Yes	:		
	Х	In fossil gas	Х	In nuclear energy
	No			

<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.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy alignment of sovereign bonds\*, the first graph shows the taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



- Taxonomy-aligned: Nuclear
- Taxonomy-aligned (no gas and nuclear)
- Non Taxonomy-aligned





- Taxonomy-aligned: Fossil gas
- Taxonomy-aligned: Nuclear
- Taxonomy-aligned (no gas and nuclear)
- Non Taxonomy-aligned

This graph represents 57.80% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

### 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 (continued)

#### Euro Bond Fund (continued)

For the reference period, 42.20% of the Fund's total investments were held in sovereign exposures. Taxonomy alignment of these exposures could not be determined due to limited data availability.

The investments held by the Fund during the reference period contributed to the following EU Taxonomy environmental objectives:

Environmental objectives	% of Investments
Climate Change Mitigation	1.26%
Climate Change Adaptation	0.00%

The data presented in the table above was not subject to an assurance provided by the Fund's auditor or a review by a third party. The assessment of EU Taxonomy alignment is based on data from a third-party vendor. The source of this data is a combination of equivalent and reported data. Equivalent data that matches the technical criteria under EU Taxonomy generates an eligibility or alignment result for those companies for which we do not have reported data.

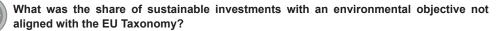
#### What was the share of investments made in transitional and enabling activities?

For the reference period, the Fund's investments in transitional and enabling activities were as follows:

	% of Investments
Transitional Activities	0.06%
Enabling Activities	0.79%

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

As this is the first reference period presented for the Fund, no comparatives are presented.

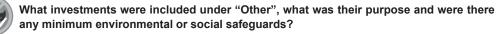


This section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio.



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

This section is not applicable for this Fund as it did not commit to holding Sustainable Investments during the reference period, however, certain Sustainable Investments may form part of the Fund's investment portfolio.



Investments included under "#2 Other" included cash and near cash instruments however such holdings did not exceed 20%. Such investments were used only for investment purposes in pursuit of the Fund's (non-ESG) investment objective, for the purposes of liquidity management and/or hedging.

No other investments held by the Fund were assessed against minimum environmental or social safeguards.



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

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 (continued)

Euro Bond Fund (continued)



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

The Investment Adviser has implemented internal quality controls such as compliance rule coding to ensure compliance with the environmental and social characteristics promoted by the Fund. The Investment Adviser regularly reviews the environmental and social characteristics promoted by the Fund to ensure they are still appropriate relative to the Fund's investment universe.

Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Adviser agrees with this external assessment, the Investment Adviser is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Adviser's direct engagement with the issuer. The Investment Adviser may also decide to reduce exposure to such issuers.

The Investment Adviser is also subject to the shareholder engagement requirements of the Shareholders Rights Directive II (SRD) requirements. The SRD aims to strengthen the position of shareholders, enhance transparency and reduce excessive risk within companies traded on regulated EU marketplaces. Further details regarding the Investment Adviser's activities under the SRD are available on BlackRock's website.



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

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

For the reference period, an index has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Fund, therefore this section is not applicable.

How does the reference benchmark differ from a broad market index?

Not applicable.

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

Not applicable.

How did this financial product perform compared with the reference benchmark?

Not applicable.

How did this financial product perform compared with the broad market index?

Not applicable.

Template 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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

CAPPED **ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS** Did this financial product have a sustainable investment objective? Yes No × It made sustainable investment It promoted Environmental/Social (E/S) × **characteristics** and while it did not have as with an environmental its objective a sustainable investment, it objective: \_\_\_% had a proportion of 56.8% of sustainable in economic activities that investments gualify as environmentally with an environmental objective in sustainable under the EU × economic activities that qualify as Taxonomy environmentally sustainable under the EU in economic activities that do Taxonomy not qualify as with an environmental objective in environmentally sustainable × economic activities that do not qualify as under the EU Taxonomy environmentally sustainable under the EU Taxonomy × with a social objective It made sustainable It promoted E/S characteristics, but **did** not make any sustainable investments investments with a social objective : \_\_\_% Unless otherwise specified, all actual data, within this periodic report are expressed as a quarterly weighted

average based on the AUM.

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

The financial product promotes environmental and social characteristics by assessing underlying investments against Environmental, Social, and Governance (ESG) criteria using an ESG internal proprietary methodology, and by investing in issuers that demonstrate good environmental and social practices, while implementing robust corporate governance practices within their sector of activity.

The financial product aims to improve its ESG profile compared to its investment universe.

The ESG performance of an issuer is evaluated against a combination of environmental, social and governance factors which include but noct limited to:

- Environmental: energy efficiency, reduction of emissions of greenhouse gases, treatment of waste

- Social: respect of human rights and workers' rights, human resources management (workers' health and safety, diversity)



Product name : BNP PARIBAS EASY MSCI WORLD SRI S-SERIES PAB 5% Legal Entity Identifier: 21380009N13WHRUQI558



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- Governance: Board of Directors independence, managers'remuneration, respect of minority shareholders rights

The exclusion criteria are applied with regard to issuers that are in violation of international norms and convention, or operate in sensitive sectors as defined by external data providers.

Furthermore, the investment manager promotes better environmental and social outcomes through engagement with issuers and the exercise of voting rights according to the Stewardship policy, where applicable.

The MSCI World SRI S-Series PAB 5% Capped (NTR) index (Bloomberg: M1CXWSC index) has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product.

The environmental objectives as well as the social objectives to which the sustainable investments of the financial product have contributed are indicated in the question "What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?".

## How did the sustainability indicators perform?

The following sustainability indicators are used to measure the attainment of the sustainable investment objective of the financial product, and are based on the reference benchmark ESG methodology:

- The percentage of the financial product's portfolio compliant with the the reference benchmark business involvement exclusion criteria: **100%** 

- The percentage of the financial product's assets covered by the ESG analysis based on the index provider ESG methodology: 100%

- The weighted average ESG score of the financial product's portfolio compared to the weighted average ESG score of its investment universe: **63.0 vs 54.6** (MSCI World (USD) NR)

- The average carbon footprint of the financial product's economic exposure compared to the average carbon footprint of its investment universe: **10.1 vs 49.3 tCO2eq/million € of asset value** 

- The percentage of the financial product's portfolio invested in 'sustainable investments' as defined in Article 2 (17) of the SFDR regulation: 56.8%

## ...and compared to previous periods?

Indicator	2022*	2023**	2024***	Comment
The percentage of the financial product's portfolio compliant with the the reference benchmark business involvement exclusion criteria	100%	100%	100%	In line with the financial product's commitment
The percentage of the financial product's assets covered by the ESG analysis based on the index provider ESG methodology	100%	100%	100%	In line with the financial product's commitment
The weighted average ESG score of the financial product's portfolio compared to the weighted average ESG score of its investment universe	64.5 vs 56.0	63.9 vs 54.9	63.0 vs 54.6	In line with the financial product's commitment
The average carbon footprint of the financial product's economic exposure compared to the average carbon footprint of its investment universe	20.7 vs 67.6	16.8 vs 59.3	10.1 vs 49.3	In line with the financial product's commitment
The percentage of the financial product's portfolio invested in 'sustainable investments' as defined in Article 2 (17) of the SFDR regulation	55.9%	57.6%	56.8%	In line with the financial product's commitment

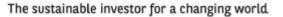
\*Figures reported in 2022 were calculated on the closing date of the accounting year

\*\* Figures reported in 2023 are expressed as a quaterly weighted average.

\*\*\* Figures reported in 2024 are expressed as a quarterly weighted average based on the AUM



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



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

The objectives of the sustainable investments made by the financial product are to finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

The investment manager is using, as of the date of the prospectus, the BNP Paribas Asset Management (BNPP AM) internal methodology, as defined in the main part of the Prospectus, to determine sustainable investments. Such methodology integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the EU Taxonomy. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: sustainable forestry, environmental restoration, sustainable manufacturing, renewable energy, water supply, sewerage, waste management and remediation, sustainable transportation, sustainable buildings, sustainable information and technology, scientific research for sustainable development;

2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the SDGs and less than 20% of its revenues misaligned with the UN SDGs. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:

a. Environmental: sustainable agriculture, sustainable management of water and sanitation, sustainable and modern energy, sustainable economic growth, sustainable infrastructure, sustainable cities, sustainable consumption and production patterns, fight against climate change, conservation and sustainable use of oceans, seas and marine resources, protection, restoration and sustainable use of terrestrial ecosystems, sustainable management of forests, fight against desertification, land degradation and biodiversity loss;

b. Social: no poverty, zero hunger, food security, healthy lives and well-being at all ages, inclusive and equitable quality education and lifelong learning opportunities, gender equality, women and girls empowerment, availability of water and sanitation, access to affordable, reliable and modern energy, inclusive and sustainable economic growth, full and productive employment and decent work, resilient infrastructure, inclusive and sustainable industrialization, reduced inequality, inclusive, safe and resilient cities and human settlements, peaceful and inclusive societies, access to justice and effective, accountable and inclusive institutions, global partnership for sustainable development.

3. A company operating in a high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: GHG emissions reduction, fight against climate change;

4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region. The E or S best performer assessment is based on the BNPP AM ESG scoring methodology. The methodology scores companies and assesses them against a peer group comprising companies in comparable sectors and geographical regions. A company with a contribution score above 10 on the Environmental or Social pillar qualifies as best performer. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:



a. Environmental: fight against climate change, environmental risk management, sustainable management of natural resources, waste management, water management, GHG emissions reduction, renewable energy, sustainable agriculture, green infrastructure;

b. Social: health and safety, human capital management, good external stakeholder management (supply chain, contractors, data), business ethics preparedness, good corporate governance.

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation 'POSITIVE' or 'NEUTRAL' from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm 'DNSH' principle) and should follow good governance practices. BNP Paribas Asset Management (BNPP AM) uses its proprietary methodology to assess all companies against these requirements.

More information on the internal methodology can be found on the website of the investmentmanager:<a href="https://docfinder.bnpparibas-am.com/api/files/14787511-CB33-49FC-B9B5-7E934948BE63">https://docfinder.bnpparibas-am.com/api/files/14787511-CB33-49FC-B9B5-7E934948BE63</a>

The proportion of investments of the financial product made in economic activities and that qualify as sustainable investments under the SFDR may contribute to the environmental objectives as defined under Taxonomy Regulation: climate change mitigation and climate change adaptation.

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

Sustainable investments that the product partially intends to make should not significantly harm any environmental or social objective (DNSH Principle). In this respect, the investment manager commits to consider principal adverse impacts on sustainability factors by taking into account indicators for adverse impacts as defined in SFDR, and to not invest in companies that do not meet their fundamental obligations in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

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

The investment manager ensures that throughout its investment process, the sustainable investments of the financial product takes into account principal adverse impact indicators by analysing within the investment process those indicators in respect of the sustainable investment pillars defined in the BNP Paribas Asset Management Global Sustainability Strategy (GSS). More information on the GSS can be found on: Sustainability documents - BNPP AM Corporate English (<u>https://www.bnpparibas-am.com/sustainability-documents/</u>).

As regards the sustainable investments that the financial product intends to make, the following principal adverse sustainability impacts are taken into account:

Corporate mandatory indicators:

- 1. GreenHouse Gas (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
- 7. Activities negatively affecting biodiversity sensitive areas



Principal adverse

**impacts** are the most

impacts of investment

sustainability factors

environmental, social

matters, respect for human rights, anti-

corruption and anti-

bribery matters.

significant negative

decisions on

relating to

and employee

8. Emissions to water

9. Hazardous waste ratio

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)

Corporate voluntary indicators:

<u>Environment</u>

4. Investments in companies without carbon emission reduction initiatives

<u>Social</u>

4. Lack of a supplier code of conduct

9. Lack of a human rights policy

Sovereign mandatory indicator:

15. GHG intensity

16. Investee countries subject to social violations

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: <u>SFDR:</u> <u>Sustainability-related disclosures - BNP Paribas</u>

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

The sustainable investments of the financial product exclude issuers that are in violation or at risk of violation of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business & Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This assessment is conducted within the BNPP AM Sustainability Centre on the basis of internal analysis and information provided by external experts, and in consultation with BNP Paribas Group CSR Team.

The EU Taxonomy sets out a 'do not significant harm' principle by which Taxonomyaligned 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 EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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





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

The product considers principal adverse impacts on sustainability factors. In order for the investment manager to determine which PAI is considered and addressed or mitigated, ESG methodology and disclosures of the reference benchmark and/or the index provider are used.

The policy framework in order to analyse how principle adverse impacts are considered for the financial product mainly relies on the three following pillars:

- 1- Analysis of the embedded exclusion process leading the investment strategy to remove industries and behaviours that present a high risk of adverse impacts in violation of international norms and conventions and issuers that are involved in activities presenting an unacceptable risk to society and/or the environment;
- 2- How the ESG ratings used throughout the investment process include in their methodology consideration of principal adverse impacts on sustainability factors, and to what extent those ratings are used in the investment strategy;
- 3- Engagement and voting policy, when applicable.

The Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts. Engagement with issuers aim at encouraging them to improve their environmental, social and governance practices and, thus, mitigate potential adverse impacts. Voting at Annual General Meetings of companies the portfolio is invested in aims at promoting good governance and advance environmental and social issues.

Based on the above approach, the financial product considers and addresses or mitigates the following principal adverse sustainability impacts:

Corporate mandatory indicators:

- 1. GreenHouse Gas (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
- 7. Activities negatively affecting biodiversity sensitive areas
- 8. Emissions to water
- 9. Hazardous waste ratio

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

13. Board gender diversity

14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Corporate voluntary indicators:

Environment

4. Investments in companies without carbon emission reduction initiatives

<u>Social</u>

- 4. Lack of a supplier code of conduct
- 9. Lack of a human rights policy

More detailed information on the manner in which BNPP AM considers principal adverseimpacts of investment decisions on sustainability factors taking due account of the size, thenature and scale of its activities and the types of financial products managed can be found in the BNPP AM SFDR disclosure statement: sustainability risk integration and Principal Adverse Impacts considerations <u>SFDR</u>: <u>Sustainability-related disclosures - BNP Paribas</u>





## The list includes the investments constituting **the** greatest proportion of investments of the financial product during the reference period which is: From 01.01.2024 to 31.12.2024

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

/	Largest investments**	Sector	% Assets*	Country**
	NVIDIA CORP	Information Technology	3,62%	United States
	TEXAS INSTRUMENT INC	Information Technology	1,69%	United States
	MICROSOFT CORP	Information Technology	1,26%	United States
	TESLA INC	Consumer Discretionary	1,25%	United States
	ASML HOLDING NV	Information Technology	1,13%	Netherlands
	INTUIT INC	Information Technology	1,06%	United States
	NXP SEMICONDUCTORS NV	Information Technology	1,02%	Netherlands
	S&P GLOBAL INC	Financials	0,98%	United States
	HOME DEPOT INC	Consumer Discretionary	0,94%	United States
	LAM RESEARCH CORP	Information Technology	0,92%	United States
	MARSH & MCLENNAN INC	Financials	0,88%	United States
	AUTODESK INC	Information Technology	0,83%	United States
	DANAHER CORP	Health Care	0,83%	United States
	FISERV INC	Financials	0,81%	United States
	ILLINOIS TOOL INC	Industrials	0,80%	United States

Source of data: BNP Paribas Asset Management, expressed as a quaterly weighted average based on the AUM. The largest investments are based on official accounting data and are based on the transaction date.

\* Any percentage differences with the financial statement portfolios result from a rounding difference.

\*\* Any difference with the portfolio statements above are coming from the use of different data's sources.

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

## What was the asset allocation ?

The proportion of the investments of the financial product used to meet the environmental or social characteristics promoted, in accordance with the binding elements of the investment strategy of the financial product is **99.0%**.

The proportion of sustainable investments of the financial product is **56.8%**.

The remaining proportion of the investments is mainly used as described under the question: "What investments were included under 'other', what was their purpose and were there any minimum environmental or social safeguards?"



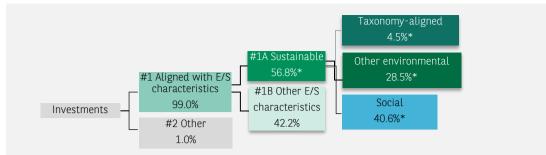
The sustainable investor for a changing world.

7

Asset allocation describes the share

of investments in

specific assets.



**#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 environmentally and socially sustainable investments.

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

\*A portfolio security classified as sustainable investment may, taking into account all its activities, both contribute to a social objective and to an environmental objective (aligned or not with the taxonomy of the EU) and the figures shown take this into account. However, the same issuer can only be recognised once for sustainable investments (#1A Sustainable).

Sectors	% Asset
Financials	20,10%
Information Technology	19,12%
Industrials	16,11%
Health Care	15,34%
Consumer Discretionary	8,07%
Consumer Staples	5,63%
Communication Services	4,42%
Real Estate	4,30%
Materials	3,94%
Utilities	2,85%
Cash	0,11%

### In which economic sectors were the investments made?

Source of data: BNP Paribas Asset Management, expressed as a quaterly weighted average based on the AUM. The largest investments are based on official accounting data and are based on the transaction date.





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

The financial product did not commit itself to having a minimum proportion of sustainable investments with an environmental objective in economic activities that are considered environmentally sustainable within the meaning of the EU Taxonomy, but did do so.

The two graphs below illustrate, according to the data available, the extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy and contribute to the environmental objectives of climate change mitigation and adaptation.

The management company uses data from third-party providers to measure the proportion of investments that are aligned with the EU Taxonomy. Providers collect companies' self-reported alignment KPIs and may use equivalent information where these are not readily available in public disclosures. More information on BNPP AM the methodology and the providers used can be found here: <u>https://docfinder.bnpparibas-am.com/api/files/0EE37EC2-8612-48A5-8AA1-D5C09CCB58DD</u>

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Further updates of the prospectus and the alignment of commitments with the EU Taxonomy may be made accordingly.

Economic activities that are not recognised by the EU taxonomy are not necessarily harmful to the environment or unsustainable. Moreover, not all activities that can make a substantial contribution to environmental and social objectives are yet integrated into the EU Taxonomy.

The compliance of those investments with the requirements laid down in article 3 of Regulation (EU) 2020/852 (Taxonomy Regulation) has not been subject to an assurance provided by an auditor or review by a third party.

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

X No:



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

To comply with

<sup>&</sup>lt;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:

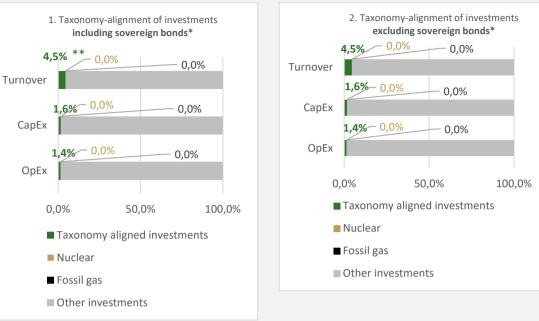
- turnover reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

## 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. The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

\*\* Real taxonomy aligned

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

The share of investments in transitional and enabling activities within the meaning of the Regulations Taxonomy is 0% for transitional activities and 0% for enabling activities.

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

	Revenue	Capex	Opex
2022*	2.4%	/	/
2023**	4.0%	/	/
2024***	4.5%	1.6%	1.4%

\*Figures reported in 2022 were calculated on the closing date of the accounting year

\*\* Figures reported in 2023 are expressed as a quaterly weighted average.

\*\*\* Figures reported in 2024 are expressed as a quarterly weighted average based on the AUM

The proportion of taxonomy-aligned economic activities in CapEx or OpEx are not disclosed in 2022 and 2023 given the current level of data at the disposal of the management company at the time.





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 European Taxonomy Regulation is **28.5%**.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Meanwhile, the financial product will invest in sustainable investments whose environmental objective is not aligned with the EU Taxonomy.

## What was the share of socially sustainable investments?

Socially sustainable investments represent **40.6%** of the financial product.

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

The remaining proportion of the investments may include :

- The proportion of assets that are not used to meet the environmental or social characteristics promoted by the financial product. These assets are used for investment purposes, or

- Instruments which are mainly used for liquidity, efficient portfolio management, and/or hedging purposes, notably cash, deposits and derivatives

In any case, the investment manager will ensure that those investments are made while maintaining the improvement of the ESG profile of the financial product. In addition, those investments are made in compliance with our internal processes, including the following minimum environmental or social safeguards:

- The risk management policy. The risk management policy comprises procedures as are necessary to enable the management company to assess for each financial product it manages the exposure of that product to market, liquidity, sustainability and counterparty risks. And

- The RBC policy, where applicable, through the exclusion of companies involved in controversies due to poor practices related to human and labour rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.



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

- The financial product shall comply with the reference benchmark business involvement and controversies exclusion criteria.
- The financial product shall have at least 90% of its investment strategy underlying securities covered by the ESG analysis based on the index provider methodology.
- The financial product aims to include the securities with the highest ESG ratings making up 25% of the market capitalization in each sector and region of the investment universe, as defined in the Prospectus.
- The financial product shall have the weighted average carbon footprint of its investment strategy portfolio at least 50% lower than the weighted average carbon footprint of its investment universe.
- The financial product investment strategy portfolio shall achieve an annual decarbonisation target of at least 7%.



- The financial product shall invest at least 40% of its assets in "sustainable investments" as defined in Article 2 (17) of SFDR. Criteria to qualify an investment as "sustainable investment" are indicated in the above question "What are the objectives of the sustainable investments that the financial product partially intends to make and does the sustainable investments contribute to such objectives" and the quantitative and qualitative thresholds are mentioned in the main part of the Prospectus.

There is no guarantee that extra-financial filter or criteria is applied at any moment. For instance and not limited to, between two index reshuffles, if a company were deemed to not fulfil anymore an ESG criteria, it may be excluded only at the next reshuffle following the index provider rules.

In addition, the management company has implemented a voting and engagement policy. Several examples of commitments are detailed in the vote and commitment section of the Sustainability Report. These documents are available at the following link: Sustainability - BNPP AM Luxembourg private investor





## Reference

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

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

The MSCI World SRI S-Series PAB 5% Capped (NTR) index (Bloomberg: M1CXWSC index) has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product.

The methodology used for the calculation of the reference benchmark can be found at: <u>www.msci.com</u>.

## How does the reference benchmark differ from a broad market index?

The reference benchmark incorporates environmental or social criteria in its asset allocation methodology whereas a relevant broad market index does not and is usually market-capitalization weighted.

## How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

Due to the index nature of the financial product, its sustainability indicators are directly linked to the ones of the tracked index. Consequently the performance of the financial product with regard to sustainability indicators representative of the alignment of the reference benchmark with the environmental or social characteristics promoted are the ones disclosed above under the question *"How did the sustainability indicators perform?"*.

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

Due to the index nature of the financial product and its investment objective to replicate the performance of the reference benchmark while maintaining a tracking error between the financial product and the index below 1%, the performance of the financial product and the one of the reference benchmark are very close.

## How did this financial product perform compared with the broad market index?

	Carbon footprint (tCO2 eq/EV) <sup>1,2</sup>	ESG score <sup>2</sup>
Financial product	10.1	63.0
Broad market index <sup>3</sup>	49.3	54.6

- (1) The carbon footprint is the sum of each carbon emission divided by its simplified enterprise value, multiplied by the weight in the portfolio. Carbon emissions represent the sum of a company's scope 1 (direct emissions from installations) and scope 2 (indirect emissions linked to the company's energy consumption) emissions. Simplified enterprise value measures a total value and is calculated as the sum of market capitalization and total debt. The footprint is expressed in tons of CO<sub>2</sub> equivalent per million euros of entreprise value.
- (2) Source: BNP Paribas Asset Management. Another provider of extra-financial data (e.g. ESG score, carbon footprint) as well as a slightly different initial investment universe may be used to determine and implement extra-financial targets of the investment strategy. For data availability purposes regarding this periodic reporting, the figures provided are based on BNP Paribas Asset Management data and may not strictly reflect these targets.

(3) MSCI World (USD) NR



## ANNEX IV

## 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:	Comgest Growth Europe Smaller Companies	Legal entity identifier:	635400CTPXBLYJWLNS96
Sustainable investment means an investment in		Environmental and/o	r social charact	eristics
an economic activity that contributes to an environmental or social	Did this fir	nancial product have a sustainable inve	estment objecti	ve?
objective, provided that	• 🛛 Y	/es	🔍 🖾 No	
the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.		t made <b>sustainable investments with</b> an environmental objective:%	<b>(E/S</b> whil sust prop	<b>comoted Environmental/Social</b> (c) characteristics and le it did not have as its objective a ainable investment, it had a portion of 18.34% of sustainable estments
The <b>EU Taxonomy</b> is a classification system laid down in Regulation (EU) 2020/852, establishing a list of <b>environmentally</b> sustainable economic		<ul> <li>in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> </ul>		with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned		in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy		objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
objective might be aligned with the Taxonomy or not.			X	with a social objective
		t made <b>sustainable investments with</b> a <b>social objective</b> :%	did	romoted E/S characteristics, but not make any sustainable estments



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained. To what extent were the environmental and/or social characteristics promoted by this financial product met?

The environmental and/or social characteristics promoted by the Fund were met by targeting and investing in companies with positive overall ESG quality.

To assist in selecting companies with positive overall ESG quality, the Investment Manager performed an ESG review of the market to identify and exclude companies with the poorest ESG credentials from the Fund's investable market. This resulted in a reduction of the investable market by at least 20%. The ESG review was applied to at least 90% of the Fund's investee companies.

In addition, throughout the period, the Investment Manager also applied an exclusion policy to exclude investment in companies with negative social and environmental characteristics as set out in the Fund's pre-contractual disclosures.

## In respect of sustainable investment held by the Fund, please find below the list of environmental objectives (set out in Article 9 of Regulation (EU) 202/852) and the list of social objectives to which the Fund's sustainable investments contributed:

## 1. Environmental objectives:

The Fund invested in sustainable investments that contributed to the environmental objective of climate change mitigation.

### 2. Social objectives:

The Fund invested in sustainable investments with social objectives that contributed to the below objectives:

- (i) the provision of decent working conditions (including for value chain workers);
- (ii) the promotion of adequate living standards and wellbeing for end users; and
- (iii) inclusive and sustainable communities and societies.

### How did the sustainability indicators perform?

As at end December 2024, the Fund had attained the environmental and social characteristics promoted, including:

- (i) at least 90% of the Fund's investee companies had an ESG score in the top 80% of companies rated by the Investment Manager;
- (ii) none of the Fund's investee companies were engaged in excluded activities; and
- (iii) 18.34% of assets qualified, in the opinion of the Investment Manager, as sustainable investments.

### ... and compared to previous periods?

Sustainability indicators	Data as at end of December 2024	Data as at end of December 2023	Data as at end of December 2022
Percentage of	At least 90% of the	At least 90% of the	At least 90% of the
investee companies	Fund's investee	Fund's investee	Fund's investee
that had an ESG score	companies had an	companies had an	companies had an
in the top 80% of	ESG score in the top	ESG score in the top	ESG score in the top
companies rated by	80% of companies	80% of companies	80% of companies
the Investment	rated by the	rated by the	rated by the
Manager.	Investment Manager.	Investment Manager.	Investment
			Manager.
Percentage of	None	None	None
investee companies			
that were engaged in			
excluded activities.	40.240/	27.040/	24.449/
Percentage of assets	18.34%	37.81%	31.44%
qualified, in the			
opinion of the			
Investment Manager,			
as sustainable			
investments.			
		nable investments that a le investment contribute	
	nd how did the sustainab % of its assets in susta	ile investment contribute	to such objectives?
partially made and The Fund invested 18.34	nd how did the sustainab % of its assets in susta and social objectives liste	inable investment contribute inable investments whic ed above.	h contributed to the
partially made at The Fund invested 18.34 environmental objectives Description of how the	nd how did the sustainable % of its assets in susta and social objectives liste sustainable investments	inable investment contribute inable investments whic ed above. s contributed to the sus environmental and/or so	to such objectives? h contributed to the stainable investment pocial objectives listed
partially made and The Fund invested 18.34 environmental objectives Description of how the objective The sustainable investme	nd how did the sustainable % of its assets in susta and social objectives liste sustainable investments	inable investment contribute inable investments whic ed above. s contributed to the sus environmental and/or so	to such objectives? h contributed to the stainable investment pocial objectives listed
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partially made andThe Fund invested 18.34environmental objectivesDescription of how the objectiveThe sustainable investme above was measured by the For the social objectives: - at least 25% of the indication of the social objective of the	nd how did the sustainable % of its assets in susta and social objectives liste sustainable investments ents' contribution to the he Investment Manager u nvestee company's rever or more of the United N	inable investment contribute inable investments which a above. contributed to the sus environmental and/or so using proprietary analysis.	to such objectives? h contributed to the stainable investment boil objectives listed finess activities which
partially made andThe Fund invested 18.34environmental objectivesDescription of how the objectiveThe sustainable investme above was measured by the For the social objectives: - at least 25% of the indication of the social objective of the	nd how did the sustainable % of its assets in susta and social objectives liste sustainable investments ents' contribution to the he Investment Manager u nvestee company's rever or more of the United N	inable investment contribute inable investments which a above. contributed to the sus environmental and/or so using proprietary analysis.	to such objectives? h contributed to the stainable investment boil objectives listed finess activities which
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<sup>1</sup> The methodology for qualifying investee companies as sustainable investments changed with effect from the Fund prospectus update on 4 June 2024. The percentage reported for 31 December 2024 reports against the updated methodology.

	For the environmental objectives:
	<ul> <li>at least 5% of the investee company's revenue is reported to be from Taxonomy-aligned activities ('Taxonomy-aligned Revenue') or is estimated, using the Taxonomy's substantial contribution criteria, to be from activities which substantially contribute to an environmental objective under the Taxonomy ('Substantial Contribution Revenue'); or</li> <li>at least 10% of the investee company's CapEx is reported to be in Taxonomy-aligned activities or is estimated, using the Taxonomy's substantial contribution criteria, to be in activities which substantially contribute to an environmental objective under the Taxonomy's substantial contribution criteria, to be in activities which substantially contribute to an environmental objective under the Taxonomy ('Substantial Contribution CapEx'); or</li> <li>the percentage of Taxonomy-aligned CapEx divided by the percentage of Taxonomy-aligned Revenue, or Substantial Contribution CapEx divided by the percentage of Substantial Contribution Revenue, is greater than 1; or</li> <li>the investee company has its near-term climate targets approved by the Science Based Targets initiative (SBTi).</li> </ul>
<b>Principal adverse impacts</b> are the most significant negative impacts of	How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?
investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti- corruption and anti- bribery matters.	An assessment was performed to ensure that investments identified as contributing to one or more of the above environmental and/or social objectives did not significantly harm any of those objectives. This was done by assessing and monitoring the 14 mandatory principal adverse impact indicators and relevant optional indicators referenced in Annex 1 of the SFDR Delegated Regulation (EU 2022/1288) and by seeking to ensure that such investments were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
	How were the indicators for adverse impacts on sustainability factors taken into account?
	The 14 mandatory principal adverse impact indicators and relevant optional indicators have been reviewed by the Investment Manager as part of its ESG assessment for sustainable investments. The Investment Manager used external data where available and also relied on a qualitative assessment using information directly from the company or its own research where quantitative data was not available. The assessment performed by the Investment Manager focused on those PAIs which are
	material, depending on the sector in which investment Manager locused on those PAIs which are material, depending on the sector in which investee companies operate. For investee companies that operate in sectors that have a limited impact on one or several PAI indicators, a brief conclusion was provided, to explain that there is no significant harm against those indicators given the sector the companies operate in. For PAIs that were material to the sectors investee companies operate in, a detailed assessment was performed to determine if the companies do significant harm. In the absence of specific data on the relevant PAI, other factors were used to assess significant harm (e.g. in the absence of data on hazardous waste, the Investment Manager assessed if a company operates in a biodiversity sensitive area and if it is linked to a controversy).

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:
The Investment Manager also assessed companies' alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights ('Guidelines and Principles') by monitoring any reported violations of global norms (this assessment is covered by PAI 10) and assessing whether the investee companies have put in place processes and compliance mechanisms to help meet the Guidelines and Principles (this assessment is covered by PAI 11).
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.
How did this financial product consider principal adverse impacts on sustainability factors?
The Fund considered principal adverse impacts ("PAI") on sustainability factors by assessing and monitoring the 14 mandatory principal adverse impact indicators (PAIs) referenced in Annex 1 of the delegated regulation (EU) 2022/1288. The Investment Manager used external data where available and relied on information directly from the company or its own research and knowledge of the relevant industry or sector to assess the 14 mandatory principal adverse impacts.
The Investment Manager has reviewed and considered the 14 mandatory PAI indicators, identifying specific issues for several of them:
- PAIs 1 to 6 "Greenhouse gas emissions ": The main emitters in the portfolio are companies operating in high-emission sectors, where emissions are inherent to their activities. The Investment Manager has engaged with the most contributing companies and has received relatively good feedback on their commitments to reduce their emissions. For instance, WizzAir has committed to significant investments to reach ambitious targets around Sustainable Aviation fuels usage.
- PAIs 7 "Biodiversity," 8 "Water," and 9 "Waste": The main challenge lies in data quality. The Investment Manager will continue its engagement with its data provider as well as with portfolio companies to improve transparency and the quality of reporting. In particular, regarding PAI 9 "Waste", the Investment Manager has initiated dialogue with one of the main contributors.

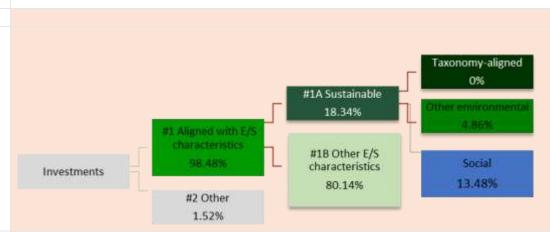
	40%, even if we note it companies, the Investment	-	ts engagement versity and inclu :heir boards.	with portfolio usion topics and
	What were the top investments of			
The list includes the	Largest investments	Sector	% of assets	Country
nvestments constituting	Scout24 SE	Communication Services	4.72	Germany
the greatest proportion	BELIMO Holding AG	Industrials	4.66	Switzerland
of investments of the	Moncler SpA	Consumer Discretionary	4.00	Italy
financial product during			4.41	United
he reference period	Halma plc	Information Technology	4.39	Kingdom
which is:	Nemetschek SE	Information Technology	4.24	Germany
	VAT Group AG	Industrials	4.09	Switzerland
				United
	Games Workshop Group PLC	Consumer Discretionary	4.01	Kingdom
	Vitrolife AB	Health Care	3.82	Sweden
	Bakkafrost P/F	Consumer Staples	3.55	Norway
	Kingspan Group Plc	Industrials	3.45	Ireland
	Amplifon SpA	Health Care	3.31	Italy
	Edenred SA	Financials	3.31	France
	Auto Trader Group PLC	Communication Services	3.24	United Kingdom
	The top investments represent the period covered, calculated at apprend of sustant of su	ainability-related investments? nvestment was 18.34% and in re and 4.86% of sustainable inv	tative of that pendet	eriod.
	Breakdown of the proportion objectives set out in Article 9 contributed		-	e investments
	Environmental objective			% of assets
	Climate change mitigation			4.86%
	Breakdown of the proportion of which those investments contri		er each of socia	l objectives to
	Social objective			% of assets
		ditions (including for value chair	1 I	2.73%
	Provision of decent working con- workers)	· -		
	_	· -		5.91%

Asset allocation describes the share of investments in specific assets.

### What was the asset allocation?

As at end of December 2024, 98.48% of the assets of the financial product were used to meet the environmental and social characteristics promoted. This included 18.34% of sustainable investments. 1.52% of assets were not aligned with the environmental or social characteristics.

The Fund was primarily invested in direct holdings of listed equities. 100% of the investments in listed equities were aligned with the environmental and/or social characteristics.



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

### In which economic sectors were the investments made?

### Sector breakdown

Sector	% of assets
Health Care	23.62
Information Technology	17.24
Industrials	17.07
Consumer Discretionary	13.43
Communication Services	10.56
Consumer Staples	9.75
Materials	4.10
Financials	2.73
Cash	1.52

Data as of end of December. Due to rounding difference, figures may not add up to 100%

Sub-industry	% of assets
Building Products	9.32
Leisure Products	8.49
Application Software	8.33
Interactive Media & Services	8.32
Biotechnology	6.90
Industrial Machinery & Supplies & Components	6.59
Health Care Equipment	6.35
Health Care Distributors	5.25
Apparel Accessories & Luxury Goods	4.94
Electronic Equipment & Instruments	4.85
Life Sciences Tools & Services	4.00
Distillers & Vintners	3.84
Industrial Gases	3.71
Packaged Foods & Meats	3.35
Transaction & Payment Processing Services	2.73
Food Retail	2.56
IT Consulting & Other Services	2.39
Movies & Entertainment	2.24
Semiconductor Materials & Equipment	1.67
Cash	1.52
Passenger Airlines	1.16
Health Care Technology	1.12
Specialty Chemicals	0.39

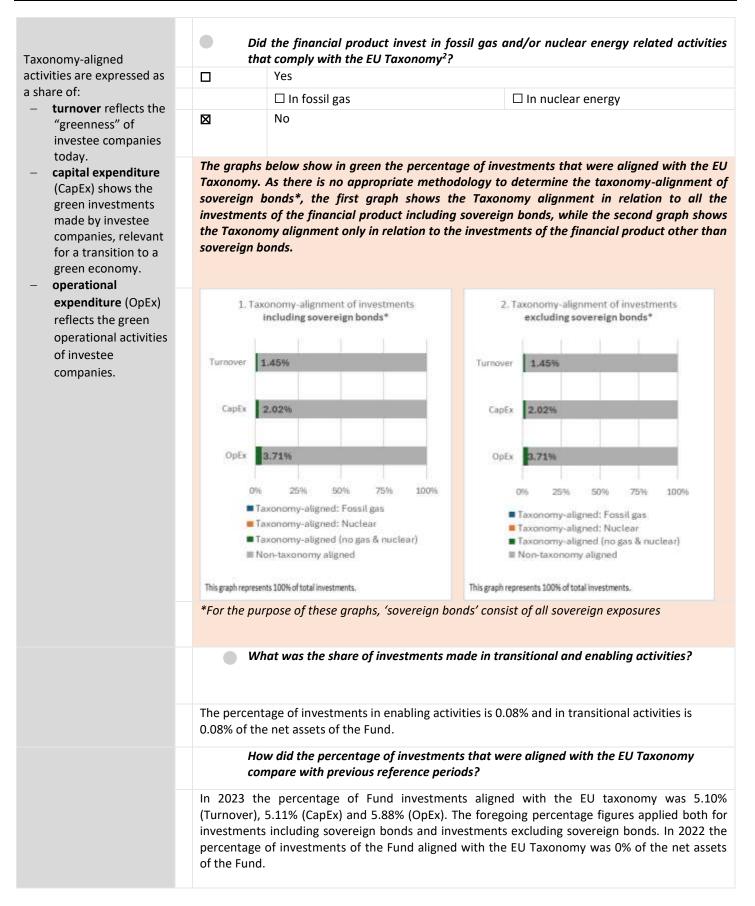
end of December. Due to rounding difference, figures may not add up to 100%

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

The percentage of sustainable investments with an environmental objective of the Fund aligned with the EU Taxonomy is 0% of the net assets of the Fund.

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

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



<sup>&</sup>lt;sup>2</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 objectives. 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.

## COMGEST GROWTH plc

are s investmen environme that **do no** account th environme sustainable activities u Regulation

sustainable ts with an	What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?
ental objective <b>t take into</b> <b>te criteria</b> for entally e economic inder (EU) 2020/852	The share of sustainable investments with an environmental objective not aligned with the EU Taxonomy is 4.86%. The Investment Manager has assessed the taxonomy eligibility and potential taxonomy alignment of the sustainable investments with an environmental objective and believes these companies are demonstrating positive advancement toward Taxonomy alignment and contribute to the environmental objectives identified.
	What was the share of socially sustainable investments?
	The share of socially sustainable investments is 13.48%.
	What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?
	As at end of December 2024, the Fund held cash for the purpose of meeting short-term cash commitments.
-2	What actions have been taken to meet the environmental and/or social characteristics during the reference period?
	Several actions were taken to meet the environmental and/or social characteristics during the reference period.
	Engagement activities: Maintaining an active relationship with investee companies is a key element of the Investment
	Manager's investment process.
	In 2024, 30 engagement activities were carried out with 21 companies in the Fund to encourage best practices with regard to ESG topics, including working toward mitigating any adverse impacts identified. 7% of the engagement activities were related to Environmental topics, 3% to Social topics, 50% to Governance topics and 40% to combined ESG topics.
	Voting activities:
	The Investment Manager exercises its right to vote at shareholder meetings in accordance with corporate governance values and voting principles that have been determined by the Investment Manager with reference to regulations, industry standards and best practice. The Investment Manager's objective is to vote systematically at all shareholder meetings when it is technically possible to do so.

## **COMGEST GROWTH plc**

	%
For	86.9%
Against	12.5%
Abstentions or Withholdings	0.6 %
In Line with Management	87.7 %
Against Management	12.3 %

Template 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: Evli Euro Liquidity

Legal entity identifier: 743700P0QPUOAVCKI185

## Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that	Did this financial product have	a sustainable investment objective?
contributes to an environmental or social objective, provided that the	□Yes	X No
investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.	<ul> <li>It made sustainable investments with an environmental objective:</li> <li>in economic activities that qualify a environmentally sustainable under EU Taxonomy</li> </ul>	characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 10.5 % of sustainable
The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally	in economic activities that do not qualify as environmentally sustain under the EU Taxonomy	able (X) with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
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	It made sustainable investments wi social objective:%	th a       with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy         with a social objective
with the Taxonomy or not.		It promoted E/S characteristics, but did not make any sustainable investments



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

The Fund has promoted environmental and social characteristics by observing Evli's Principles for Responsible Investment, Climate Change Principles, and Climate Targets, and by requiring that target companies observe good governance practices. The Fund has used the means described below to implement the environmental and social characteristics it promotes:

ESG integration: the Fund's target companies have been analyzed before making an investment decision and during the investment period with regard to environmental, social, and corporate governance matters, in other words, ESG factors. The analysis is based on an internal ESG database built by Evli, which is based on data from external providers. During the year, Evli developed ESG integration and portfolio management tools, such as climate metrics, and enhanced biodiversity analysis. Evli's equity and corporate bond funds have been awarded ESG4Real certification. ESG4Real is a non-profit and politically independent certification that provides a basic platform for responsible investment and ESG analysis and offers independent quality assurance on asset managers' attainment of these requirements.

Exclusion by industry: the Fund has excluded harmful industries on the basis of Evli's Principles for Responsible Investment and Climate Change Principles. In addition, the target companies have been monitored regularly for violations of the principles defined in the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Principles for Multinational Enterprises. On the basis of regular monitoring, Evli's Responsible Investment Team will take the necessary measures with respect to companies that are suspected of having violated the above-mentioned international principles. Such companies can either be excluded directly or Evli can engage with them. If dialogue with a company fails or is deemed to be unhelpful, the company may be added to the exclusion list.

Climate change mitigation: Evli's goal is to achieve carbon neutrality by 2050 at the latest, and it has set an interim target of a 50% reduction in indirect emissions from all investments by 2030, provided that the investment environment allows for it. The comparison year is 2019. The fund-specific share of the emission reduction target may vary between funds. As part of its climate efforts, Evli set the first interim target under the Net Zero Asset

Managers (NZAM) initiative. The interim target consists of three separate targets: an investment target, an engagement target and a company assessment target. Work on Evli's climate goals and NZAM interim targets continued during the year, including training portfolio management on the indicators, methodologies, and tools for the NZAM targets.

Active ownership and engagement: in 2024, Evli exercised active ownership by engaging with a total of 32 companies. Evli began engagement with seven companies in the Fund during the year.

In addition, Evli participated as a company in the following investor initiatives that promote Evli's responsible investment themes: Climate Action 100+, Nature Action 100, investor letters coordinated by CDP, and engagement through CDP, the purpose of which is to encourage companies to set Science-Based Targets. In the area of human rights, Evli also continued as an endorser in the PRI Advance initiative, under which investors take joint action on human rights and social issues. In early 2024, Evli joined the PRI's Spring initiative, where institutional investors engage with companies to prevent and halt biodiversity loss by 2030. In spring 2024, Evli signed the Finance Statement on Plastic Pollution, an investor statement to promote the global plastics treaty. Evli also signed the 2024 Global Investor Statement to Governments on the Climate Crisis investor letter, which calls on governments to take the necessary policy actions to accelerate the private capital flows required for the just transition to a climate-resilient and nature-positive economy.

#### How did the sustainability indicators perform?

	2024	2023	2022
Companies without serious norm violations	100.0 %	100.0 %	100.0 %
Share of companies with Paris aligned climate targets	47.5 %	51.3 %	46.4 %
Weighted Average Carbon Intensity (Scope 1+2 tCO2e / \$M sales) o investments	of reporting year's		
Reporting year	98.9	103.0	114.3
Reporting year - 1	112.0	131.0	164.6
Reporting year - 2	165.3	184.3	293.9

#### ...and compared to previous periods?

The performance of the sustainability indicators in previous reporting years is shown above.

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

The fund promotes environmental and social characteristics in addition to other characteristics but does not commit to making sustainable investments. The fund has, however, made investments that meet the criteria of the EU taxonomy system (EU Taxonomy Regulation) in environmentally sustainable economic activities. The EU Taxonomy Regulation sets criteria for environmentally sustainable economic activity that is considered to promote the environmental objectives of the regulation. More detailed information on EU taxonomy-aligned investments can be found later in the report.

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.

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

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

Evli has taken account of the principal adverse impacts of its investments on sustainability factors (Principal Adverse Impact or PAI indicators) in accordance with Evli's Principles for Responsible Investment and its Climate Change Principles. All mandatory indicators measuring greenhouse gas emissions, biodiversity, water, waste and social and employee matters, plus two voluntary indicators (environmental indicator 4. Investments in companies without carbon emission reduction initiatives, and social indicator 14. Number of identified cases of severe human rights issues and incidents) has been taken into account. The PAI indicators have been considered through an internal process based on Evli's Principles for Responsible Investment. An internal PAI tool has been built based on data from an external service provider to view PAI indicators relevant to the investment target. Evli's Principles for Responsible Investment are asset class-specific and cover all Evli funds. Evli's Principles for Responsible Investment and Climate Change Principles define industry-specific exclusion limits and the process for dealing with any identified norm violations.

During the year, the responsible investment team has analyzed the harmful sustainability impacts of companies and continues to monitor the companies' development as part of the PAI indicator consideration. One company has been placed under monitoring from the fund during the year based on the results of the PAI indicators.



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

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

Sector	% Assets	Country
Energy	2.39 %	Finland
Technology & Electronics	2.19 %	Finland
Utility	1.89 %	Finland
Basic Industry	1.76 %	Norway
Real Estate	1.75 %	Sweden
Real Estate	1.74 %	Sweden
Capital Goods	1.44 %	Sweden
Energy	1.44 %	Finland
Basic Industry	1.44 %	Denmark
Banking	1.39 %	Denmark
Banking	1.35 %	Estonia
Capital Goods	1.32 %	Finland
Services	1.29 %	Netherlands
Banking	1.29 %	Finland
Banking	1.28 %	Sweden
	Energy Technology & Electronics Utility Basic Industry Real Estate Real Estate Capital Goods Energy Basic Industry Banking Capital Goods Services Banking	Energy2.39 %Technology & Electronics2.19 %Utility1.89 %Basic Industry1.76 %Real Estate1.75 %Real Estate1.74 %Capital Goods1.44 %Banking1.39 %Banking1.32 %Services1.29 %Banking1.29 %



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

#### What was the asset allocation?

Asset allocation describes the share of investments in specific assets. 81.3 % of the Fund's investments promoted environmental and social characteristics (#1B) in ways mentioned above. The Fund has made 10.5 % taxonomy-aligned investments (Taxonomy-aligned). The Fund has held 8.2 % other investments (#2), for example cash or derivatives.



**#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 environmentally and socially sustainable investments.

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

#### In which economic sectors were the investments made?

Sector	% Assets
Banking	20.5 %
Capital Goods	15.5 %
Basic Industry	14.0 %
Real Estate	8.8 %
Utility	6.5 %
Technology & Electronics	5.2 %
Energy	5.1 %
Consumer Goods	3.3 %
Transportation	2.8 %
Services	2.6 %
Healthcare	2.1 %
Financial Services	2.0 %
Telecommunications	1.6 %
Retail	1.1 %
Media	0.5 %
Leisure	0.1 %
Sectors and sub-sectors that derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels	3.71 %

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

Taxonomy-aligned activities are expressed as a share of:

turnover reflecting the share of revenue from green activities of investee companies

capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

operational expenditure (OpEx) reflecting green operational activities of

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

The fund has made investments that are EU taxonomy-aligned as set out below. Other reported investments that

by a third party. The fund reports only on the information that is available on taxonomy. As data on alignment with

taxonomy is only partially available from companies, the proportion of taxonomy-aligned investments is partly

based on the calculations of the data provider. The data presented for taxonomy-aligned fossil gas and nuclear energy and the proportions of capital and operating expenditure are those reported by the target companies. In

addition to the data reported by the companies, taxonomy-aligned revenue is based on estimates from the data

promote environmental factors are not sustainable investments under the Taxonomy Regulation. The presented proportion of taxonomy-aligned investments is based on data provided by an external data provider and not verified

Yes:

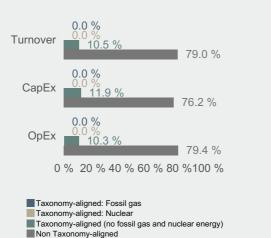
provider.

In fossil gas In nuclear energy

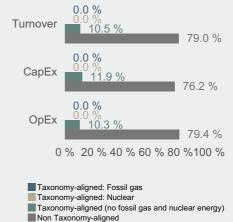
X No

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds'



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

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

The fund has made 10.5 % taxonomy-aligned investments. According to the information reported by the companies, the share of transitional activities has been 4.9 % and enabling activities 1.7 %.

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

The share of taxonomy-aligned investments based on revenue was 4.5 % in 2023 and 4.5 % in 2022.

investee companies

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 rule

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

Transitional activities are activities for which lowcarbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance

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

The Principles for Responsible Investment, the Climate Change Principles and the exclusion principles apply to all direct investments made by the fund. The fund has also made investments for hedging or liquidity purposes, for example. The fund may also have invested in derivatives contracts both for hedging purposes and within the fund's investment strategy, and it may have held cash. Such investments are not subject to the ESG requirements or minimum safeguards described above.



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

Evli Euro Liquidity has promoted environmental and social characteristics and has focused especially on the comprehensive assessment of target companies' sustainability and has avoided investing in companies that have problems with sustainability factors. In addition to the current state of sustainability factors, the analysis focused on the direction of development, the targets set by the companies and the plausibility of the development plans. Active and continuous sustainability monitoring and the ability to react to any emerging sustainability problems are crucial in portfolio management.

The fund has engaged with some of its the target companies during the review period as part of the promotion of environmental and social characteristics. The aim of the engagement has been to accelerate the development of sustainability factors in the target companies' operations and to encourage the companies to establish science-based emission reduction targets.

<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.

#### Sources: Evli, MSCI, ISS STOXX

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Template 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: Evli Global

Legal entity identifier: 743700V8NI0OS6S2UW75

## Environmental and/or social characteristics

an	Did this financial product have a susta	inable investment objective?
he	□Yes	XNo
w es.	<ul> <li>It made sustainable investments with an environmental objective:</li> <li>in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	$\boxed{X}$ It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 5.0 % of sustainable investments
list	in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
n of	It made sustainable investments with a social objective:%	with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
d t.		with a social objective
		It promoted E/S characteristics, but did not make any sustainable investments



Sustainable investment in economic activity that contributes to an environmental or social objective, provided that to investment does not significantly harm any environmental or social objective and that the investee companies follo good governance practic

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a of environmentally sustainable economic activities. That Regulatio does not lay down a list socially sustainable economic activities. Sustainable investments with an environmental objective might be aligne with the Taxonomy or no

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

The Fund has promoted environmental and social characteristics by observing Evli's Principles for Responsible Investment, Climate Change Principles, and Climate Targets, and by requiring that target companies observe good governance practices. The Fund has used the means described below to implement the environmental and social characteristics it promotes:

**ESG integration**: the Fund's target companies have been analyzed before making an investment decision and during the investment period with regard to environmental, social, and corporate governance matters, in other words, ESG factors. The analysis is based on an internal ESG database built by Evli, which is based on data from external providers. During the year, Evli developed ESG integration and portfolio management tools, such as climate metrics, and enhanced biodiversity analysis. Evli's equity and corporate bond funds have been awarded ESG4Real certification. ESG4Real is a non-profit and politically independent certification that provides a basic platform for responsible investment and ESG analysis and offers independent quality assurance on asset managers' attainment of these requirements.

**Exclusion by industry:** the Fund has excluded harmful industries on the basis of Evli's Principles for Responsible Investment and Climate Change Principles. In addition, the target companies have been monitored regularly for violations of the principles defined in the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Principles for Multinational Enterprises. On the basis of regular monitoring, Evli's Responsible Investment Team will take the necessary measures with respect to companies that are suspected of having violated the above-mentioned international principles. Such companies can either be excluded directly or Evli can engage with them. If dialogue with a company fails or is deemed to be unhelpful, the company may be added to the exclusion list.

**Climate change mitigation:** Evli's goal is to achieve carbon neutrality by 2050 at the latest, and it has set an interim target of a 50% reduction in indirect emissions from all investments by 2030, provided that the investment environment allows for it. The comparison year is 2019. The fund-specific share of the emission reduction target may vary between funds. As part of its climate efforts, Evli set the first interim target under the Net Zero Asset

Managers (NZAM) initiative. The interim target consists of three separate targets: an investment target, an engagement target and a company assessment target. Work on Evli's climate goals and NZAM interim targets continued during the year, including training portfolio management on the indicators, methodologies, and tools for the NZAM targets.

Active ownership and engagement: in 2024, Evli exercised active ownership by engaging with a total of 32 companies. There were no new engagement cases in the Fund during the year.

In addition, Evli participated as a company in the following investor initiatives that promote Evli's responsible investment themes: Climate Action 100+, Nature Action 100, investor letters coordinated by CDP, and engagement through CDP, the purpose of which is to encourage companies to set Science-Based Targets. In the area of human rights, Evli also continued as an endorser in the PRI Advance initiative, under which investors take joint action on human rights and social issues. In early 2024, Evli joined the PRI's Spring initiative, where institutional investors engage with companies to prevent and halt biodiversity loss by 2030. In spring 2024, Evli signed the Finance Statement on Plastic Pollution, an investor statement to promote the global plastics treaty. Evli also signed the 2024 Global Investor Statement to Governments on the Climate Crisis investor letter, which calls on governments to take the necessary policy actions to accelerate the private capital flows required for the just transition to a climate-resilient and nature-positive economy.

#### How did the sustainability indicators perform?

	2024	2023	2022
Companies without serious norm violations	100.0 %	100.0 %	100.0 %
Share of companies with Paris aligned climate targets	52.4 %	56.5 %	46.8 %
Weighted Average Carbon Intensity (Scope 1+2 tCO2e / \$M sales) investments	of reporting year's		
Reporting year	83.0	52.3	64.7
Reporting year - 1	85.0	63.8	73.7
Reporting year - 2	124.2	71.5	77.3

#### ...and compared to previous periods?

The performance of the sustainability indicators in previous reporting years is shown above.

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

The fund promotes environmental and social characteristics in addition to other characteristics but does not commit to making sustainable investments. The fund has, however, made investments that meet the criteria of the EU taxonomy system (EU Taxonomy Regulation) in environmentally sustainable economic activities. The EU Taxonomy Regulation sets criteria for environmentally sustainable economic activity that is considered to promote the environmental objectives of the regulation. More detailed information on EU taxonomy-aligned investments can be found later in the report.

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.

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

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

Evli has taken account of the principal adverse impacts of its investments on sustainability factors (Principal Adverse Impact or PAI indicators) in accordance with Evli's Principles for Responsible Investment and its Climate Change Principles. All mandatory indicators measuring greenhouse gas emissions, biodiversity, water, waste and social and employee matters, plus two voluntary indicators (environmental indicator 4. Investments in companies without carbon emission reduction initiatives, and social indicator 14. Number of identified cases of severe human rights issues and incidents) has been taken into account. The PAI indicators have been considered through an internal process based on Evli's Principles for Responsible Investment. An internal PAI tool has been built based on data from an external service provider to view PAI indicators relevant to the investment target. Evli's Principles for Responsible Investment are asset class-specific and cover all Evli funds. Evli's Principles for Responsible Investment and Climate Change Principles define industry-specific exclusion limits and the process for dealing with any identified norm violations.

During the year, the responsible investment team has analyzed the harmful sustainability impacts of companies and continues to monitor the companies' development as part of the PAI indicator consideration. No companies have been excluded, engaged with, or placed under monitoring from the fund based on the results of the PAI indicators.



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

Largest investments	Sector	% Assets	Country
Allison Transmission Holdings	Industrials	2.64 %	United States
Victory Capital Holdings Inc	Financials	2.36 %	United States
Progress Software Corp	Information Technology	2.34 %	United States
Dropbox Inc	Information Technology	2.33 %	United States
Snap-on Inc	Industrials	2.31 %	United States
Sankyo Co Ltd	Consumer Discretionary	2.29 %	Japan
Betsson AB	Consumer Discretionary	2.17 %	Sweden
Patrick Industries Inc	Consumer Discretionary	2.15 %	United States
Systena Corp	Information Technology	2.14 %	Japan
Acuity Brands Inc	Industrials	2.12 %	United States
Holcim Ltd	Materials	2.07 %	Switzerland
Cardinal Health Inc	Health Care	2.06 %	United States
CTS Corp	Information Technology	2.06 %	United States
Cie de Saint-Gobain	Industrials	2.0 %	France
DKSH Holding AG	Industrials	1.99 %	Switzerland

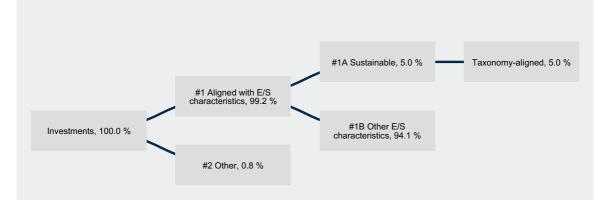
The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 2024



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

#### What was the asset allocation?

Asset allocation describes the share of investments in specific assets. 94.1 % of the Fund's investments promoted environmental and social characteristics (#1B) in ways mentioned above. The Fund has made 5.0 % taxonomy-aligned investments (Taxonomy-aligned). The Fund has held 0.8 % other investments (#2), for example cash or derivatives.



**#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 environmentally and socially sustainable investments.

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

#### In which economic sectors were the investments made?

Sector	% Assets
Industrials	27.1 %
Information Technology	23.5 %
Consumer Discretionary	18.4 %
Health Care	15.8 %
Financials	6.2 %
Communication Services	4.2 %
Materials	2.1 %
Consumer Staples	1.9 %
Sectors and sub-sectors that derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels	1.9 %

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

The fund has made investments that are EU taxonomy-aligned as set out below. Other reported investments that

by a third party. The fund reports only on the information that is available on taxonomy. As data on alignment with

taxonomy is only partially available from companies, the proportion of taxonomy-aligned investments is partly

based on the calculations of the data provider. The data presented for taxonomy-aligned fossil gas and nuclear energy and the proportions of capital and operating expenditure are those reported by the target companies. In

addition to the data reported by the companies, taxonomy-aligned revenue is based on estimates from the data

promote environmental factors are not sustainable investments under the Taxonomy Regulation. The presented proportion of taxonomy-aligned investments is based on data provided by an external data provider and not verified

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee

(CapEx) showing the green investments made by

operational expenditure (OpEx) reflecting green operational activities of investee companies

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

Yes:

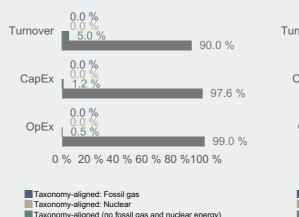
provider.

In fossil gas In nuclear energy

X No

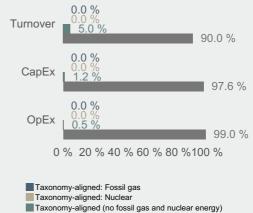
The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



Taxonomy-aligned (no fossil gas and nuclear energy) Non Taxonomy-aligned

2. Taxonomy-alignment of investments excluding sovereign bonds\*



Non Taxonomy-aligned

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

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

The fund has made 5.0 % taxonomy-aligned investments. According to the information reported by the companies, the share of transitional activities has been 0.0 % and enabling activities 0.4 %.

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

The share of taxonomy-aligned investments based on revenue was 4.6 % in 2023 and 3.0 % in 2022.

companies capital expenditure

investee companies, e.g. for a transition to a green economy.

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 lowcarbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance

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

The Principles for Responsible Investment, the Climate Change Principles and the exclusion principles apply to all direct investments made by the fund. The fund has also made investments for hedging or liquidity purposes, for example. The fund may also have invested in derivatives contracts both for hedging purposes and within the fund's investment strategy, and it may have held cash. Such investments are not subject to the ESG requirements or minimum safeguards described above.



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

Fifteen companies were excluded from the target list of Evli Global fund for product-related reasons (reasons related to society), two companies were excluded for environmental and social reasons related to the principles of the UN Global Compact, and seventeen companies were excluded on the basis of Evli's Climate Change Principles. Four companies were removed from the Fund's target list for other sustainability-related reasons. Engagement with one company related to social reasons was started in 2023 was discontinued in 2024 due to divesting.

<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.

#### Sources: Evli, MSCI, ISS STOXX

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#### ANNEX IV

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: Nordea 1 - Emerging Stars Equity Fund Legal entity identifier: 549300UFJRQ77N3UYE48

## **Environmental and/or social characteristics**

Sustainable investment means an investment	Did this financial product have a sustain	able investment objective?
in an economic activity that contributes to an environmental or social	• • Yes	• • 🗸 No
objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.	<ul> <li>It made sustainable investments with an environmental objective:</li> <li>%</li> <li>in economic activities that qualify as environmentally</li> </ul>	✓ It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 66 % of sustainable investments
The <b>EU Taxonomy</b> is a classification system laid down in Regulation (EU) 2020/852, establishing a list of <b>environmentally</b> <b>sustainable economic</b> <b>activities.</b> 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.	sustainable under the EU Taxonomy <ul> <li>in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li>It made sustainable investments with a social objective:%</li> </ul>	<ul> <li>with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li>with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>
		v with a social objective
		It promoted E/S characteristics, but <b>did not make any sustainable</b> <b>investments</b>



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained. To what extent were the environmental and/or social characteristics promoted by this financial product met?

The E/S characteristics promoted could have been environmental and/or social and included the following features:

**Minimum proportion of sustainable investments** The fund promoted E/S characteristics by partially investing in companies and issuers involved in activities that contributed to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices.

**ESG scoring** The fund promoted E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that met the minimum required ESG score were eligible for inclusion and that ESG laggards were excluded.

**Carbon footprint scope 1, 2 & 3 limit** The fund promoted E/S characteristics by maintaining the total carbon footprint of the fund's investments at least 20% below the total carbon footprint of the reference benchmark. The carbon footprint was measured by the scope 1, 2 and 3 greenhouse gas emissions.

**Sector- and value-based exclusions** The fund promoted E/S characteristics by excluding companies that were deemed to be inappropriate based on their business activities or corporate behaviour.

**Nordea Asset Management's Paris-Aligned Fossil Fuel Policy** The fund promoted E/S characteristics by refraining from investing in companies that had significant exposure to fossil fuels unless they had a credible transition strategy.

There was no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

#### How did the sustainability indicators perform?

Sustainability Indicator	Metric	Metric Value	Eligibility	Coverage
% of sustainable investments	% of sustainable investments	65.18 %	98.19 %	98.19 %
% of Investments, aligned with the E/S characteristics, with an ESG score that do not meet the minimum threshold	% of Investments, aligned with the E/S characteristics, with an ESG score that do not meet the minimum threshold	0.00 %	98.43 %	98.43 %
% of investments, aligned with the E/S characteristics, that do not comply with sector- and value based exclusions	% of investments, aligned with the E/S characteristics, that do not comply with sector- and value based exclusions	0.00 %	98.43 %	98.43 %
% of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris- Aligned Fossil Fuel Policy	% of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris- Aligned Fossil Fuel Policy	0.00 %	98.43 %	98.43 %
Relative carbon footprint scope 1, 2 and 3	Relative carbon footprint scope 1, 2 and 3	-79.97 %	98.43 %	98.43 %

**Eligibility:** The proportion of the assets in the financial product (relative to NAV), which are in scope for the indicator.

**Coverage:** The proportion of the assets in the financial product (relative to NAV), where data is available to present the indicator.

and	compared	to	nrovious	noriods?
unu	comparea	ω	previous	perious:

Sustainability Indicator	Metric	Reference Period	Metric Value	Eligibility	Coverage
		2024	65.18 %	98.19 %	98.19 %
% of sustainable investments	% of sustainable investments	2023	N/A	N/A	N/A
investments	investments	2022	N/A	N/A	N/A
% of Investments, aligned with the E/S	% of Investments, aligned with the	2024	0.00 %	98.43 %	98.43 %
characteristics, with an ESG score that	E/S characteristics, with an ESG score	2023	N/A	N/A	N/A
do not meet the minimum threshold	minimum threshold	2022	N/A	N/A	N/A
% of investments, aligned with the E/S	% of investments, aligned with the E/S	2024	0.00 %	98.43 %	98.43 %
characteristics, that do not comply with	characteristics, that do not comply with sector- and value	2023	N/A	N/A	N/A
sector- and value based exclusions	based exclusions	2022	N/A         N/A           N/A         N/A		N/A
% of investments, aligned with the E/S	aligned with the E/S % of investments,		0.00 %	98.43 %	98.43 %
characteristics,	aligned with the E/S characteristics, that do not comply with	2023	N/A	N/A	N/A
NAM's Paris- Aligned Fossil Fuel Policy		2022	N/A	N/A	N/A
		2024	-79.97 %	98.43 %	98.43 %
Relative carbon footprint scope 1, 2 and 3	Relative carbon footprint scope 1, 2 and 3	2023	N/A	N/A	N/A
		2022	N/A	N/A	N/A

**Eligibility:** The proportion of the assets in the financial product (relative to NAV), which are in scope for the indicator.

**Coverage:** The proportion of the assets in the financial product (relative to NAV), where data is available to present the indicator.

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

The objective of the sustainable investments that the fund partially made, was to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contributed to the objectives through the fund's investments in companies where a minimum of 20% of their activity could be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs.

The UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030.

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

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

As part of the process to identify sustainable investments, companies were screened to ensure that they did not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test used PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

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

As part of the process to identify sustainable investments, companies were screened to ensure that they did not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test used PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identified negative outliers and poor performance related to PAI indicators. The investment manager considered the PAI indicators from Table 1, annex 1 in the SFDR RTS. In the reporting period, data was mainly available for the use of the below indicators.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that did not pass the thresholds that were defined by the investment manager, did not qualify as a sustainable investment. This included companies that were involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles.

Companies also failed the DNSH test if they were among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derived more than 0% of revenue from unconventional fossil fuel failed the DNSH test, and companies that derived more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry only passed the DNSH test if they were below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and had a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans.

Additional exclusions to further limit negative externalities were applied to the investment universe of the fund, to avoid investment in companies that were involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography.

The data on PAI indicators needed for the DNSH test was sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights was confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund do not take into account the EU criteria for environmentally sustainable economic activities.

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



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

The specific PAI indicators that were taken into consideration for this fund were:

Adverse Sust	ainability Indicator	Metric	Metric Value	Eligibility	Coverage
	GHG emissions	Scope 1 GHG emissions	7,276 tCO2e	98.43 %	98.13 %
		Scope 2 GHG emissions	18,403 tCO2e	98.43 %	98.13 %
		Scope 3 GHG emissions	201,136 tCO2e	98.43 %	98.02 %
		Total GHG emissions Scope 1+2	25,679 tCO2e	98.43 %	98.13 %
		Total GHG emissions Scope 1+2+3	226,818 tCO2e	98.43 %	98.02 %
	Carbon footprint	Carbon footprint Scope 1+2	16 tCO2e / m€ invested	98.43 %	98.13 %
	Carbon tootprint	Carbon footprint Scope 1+2+3	142 tCO2e / m€ invested	98.43 %	98.02 %
Greenhouse gas "GHG"	GHG intensity	GHG intensity of investee companies	66 tCO2e / m€ of owned revenue	98.43 %	98.13 %
emissions	of investee companies	GHG intensity of investee companies Scope 1+2+3	578 tCO2e / m€ of owned revenue	98.43 %	98.02 %
	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0.00 % investments in fossil fuels	98.43 %	95.89 %
		Share of non- renewable energy consumption and	83.48 % non- renewable energy consumption	98.43 %	79.12 %
	Share of non- renewable energy of invester consumption and production energy so energy so compare	non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources	0.00 % non- renewable energy production	98.43 %	0.00 %

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sust	ainability Indicator	Metric	Metric Value	Eligibility	Coverage
		Agriculture forestry and fishing (A)	0.00 GWh / m€ of revenue	0.00 %	0.00 %
		Mining and quarrying (B)	1.27 GWh / m€ of revenue	1.18 %	1.18 %
		Manufacturing (C)	0.26 GWh / m€ of revenue	38.07 %	38.07 %
		Electricity gas steam and air conditioning supply (D)	0.00 GWh / m€ of revenue	0.00 %	0.00 %
Greenhouse gas "GHG" emissions	Energy consumption intensity per high impact climate sector	Water supply sewerage waste management and remediation activities (E)	0.00 GWh / m€ of revenue	0.00 %	0.00 %
		Construction (F)	0.02 GWh / m€ of revenue	1.41 %	1.41 %
		Wholesale and retail trade repair of motor vehicles and motorcycles (G)	0.08 GWh / m€ of revenue	13.56 %	13.56 %
		Transportation and storage (H)	0.00 GWh / m€ of revenue	0.00 %	0.00 %
		Real estate activities (L)	0.00 GWh / m€ of revenue	0.00 %	0.00 %
Biodiversity	Activities negatively affecting biodiversity- sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity- sensitive areas	0.00 % with negative impact	98.43 %	98.25 %
Water	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00 tons / m€ invested	98.43 %	12.58 %
Waste	Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	259.38 tons / m€ invested	98.43 %	96.72 %

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sust	tainability Indicator	Metric	Metric Value	Eligibility	Coverage
	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00 % involved in violations	98.43 %	98.13 %
Social and employee matters	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance / complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00 % without policies	98.43 %	94.06 %
	Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	5.96 % pay gap	98.43 %	26.98 %
	Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	20.15 % (female directors / total directors)	98.43 %	95.50 %
	Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00 % involvement	98.43 %	97.37 %

#### SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

**Eligibility:** The proportion of the assets in the financial product (relative to NAV), which are in scope for the indicator.

**Coverage:** The proportion of the assets in the financial product (relative to NAV), where data is available to present the indicator.



## 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: 1 January 2024 -31 December 2024

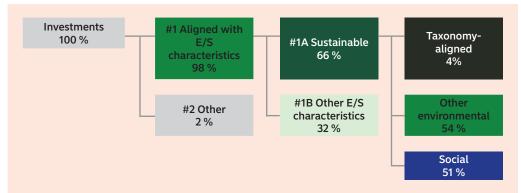
Largest investments	Sector	Assets	Country
Taiwan Semiconductor Manufacturing	Technology	9.68 %	Taiwan, Province of China
Tencent Holdings	Communications	6.44 %	China
Samsung Electronics	Technology	5.87 %	Republic Of Korea
Alibaba Group Holding	Communications	3.69 %	China
ICICI Bank	Financial	3.53 %	India
MercadoLibre	Communications	3.00 %	Uruguay
HDFC Bank	Financial	2.71 %	India
Trip.com Group ADR	Communications	2.55 %	Singapore
Bank Rakyat Indonesia Persero	Financial	2.47 %	Indonesia
Wal-Mart de Mexico	Consumer, Cyclical	2.41 %	Mexico
SK Hynix	Technology	2.11 %	Republic Of Korea
Grupo Financiero Banorte	Financial	2.10 %	Mexico
Military Commercial Joint Stock Bank	Financial	2.07 %	Viet Nam



What was the proportion of sustainability-related investments?

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

The product contains investments with both an environmental and a social objective. A single investment can both contribute to an environmental and a social objective resulting in a total allocation amounting to more than 100 per cent. There is no prioritisation of environmental and social objectives, and the strategy does not target any specific allocation or minimum proportion for either of these categories. The investment process accommodates the combination of environmental and social objectives by allowing the investment manager the flexibility to allocate between these based on availability and attractiveness of investment opportunities.

#### • In which economic sectors were the investments made?

Sector	Sub Sector	Assets
Basic Materials	Mining	1.18 %
Cash	Cash	1.57 %
Communications	Internet	20.62 %
Consumer, Cyclical	Apparel	1.16 %
Consumer, Cyclical	Auto Parts&Equipment	2.34 %
Consumer, Cyclical	Retail	6.42 %
Consumer, Non-cyclical	Beverages	2.26 %
Consumer, Non-cyclical	Cosmetics/Personal Care	1.65 %
Consumer, Non-cyclical	Food	1.50 %
Consumer, Non-cyclical	Household Products/Wares	0.32 %
Energy	Energy-Alternate Sources	1.37 %
Financial	Banks	15.92 %
Financial	Diversified Finan Serv	2.87 %
Financial	Insurance	4.23 %
Financial	Real Estate	1.41 %
FX Forwards	FX Forwards	0.00 %
Industrial	Electrical Compo&Equip	0.58 %
Industrial	Electronics	5.25 %
Industrial	Machinery-Diversified	2.98 %
Industrial	Metal Fabricate/Hardware	1.51 %
Industrial	Miscellaneous Manufactur	1.15 %
Technology	Semiconductors	21.83 %
Technology	Software	1.87 %
Sum		100.00 %

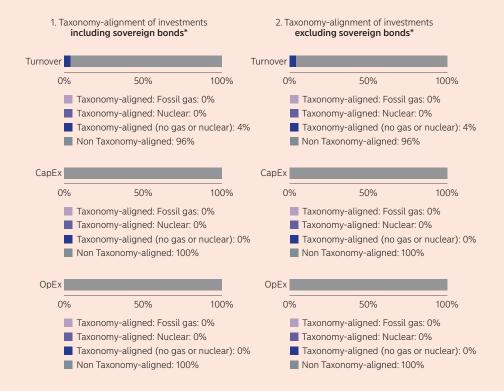


To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

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



The graphs below show in blue the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds<sup>\*</sup>, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

<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 significant harm to 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.

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 lowcarbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

There is no data available for the reporting period to confirm that the financial product invested in any fossil fuel gas and/or nuclear energy related activities that comply with the EU Taxonomy.

Assessment on Taxonomy alignment is currently conducted with data from third party providers as well as self-reported data from investee companies when available. Proprietary tools and processes to measure significant harm and minimum social safeguards have been developed.

The methodology applied by the third-party data providers assesses how companies are involved in economic activities that substantially contribute to an environmental objective while not significantly harming other sustainable objectives and meeting minimum social safeguards. Taxonomy-alignment of the investment is based on the percentage of turnover exposed or potentially exposed to taxonomy-aligned activities. Data providers' methodologies vary and results may not be fully aligned as long as publicly reported company data is still lacking and assessments rely largely on equivalent data.

We prioritise the use of self-reported data where available. Where data providers are used to deliver equivalent data, NAM has conducted due diligence on the data provider's methodology. Out of caution, unless we are able to confirm available data for the majority of the portfolio's holdings, we will report 0 (zero) per cent of Taxonomy-Aligned Investments.

The compliance of the investments with the EU Taxonomy has not been subject to an assurance by auditors or a review by third parties. Data provider methodologies vary and results may not be fully aligned as long as publicly reported data is still lacking.

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

Type of Activity	Assets
Transitional activities	0.00 %
Enabling activities	2.62 %
Sum	2.62 %

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

Reference Period	Taxonomy-Aligned Investments
2024	3.56 %
2023	0.00 %
2022	0.00 %



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 not aligned with the EU Taxonomy was 54 %.



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

The share of socially sustainable investments was 51 %.



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

Cash may have been held as ancillary liquidity or for risk balancing purposes. The fund may have used derivatives and other techniques for the purposes described in the "Fund Descriptions" in the prospectus. This category may also have included securities for which relevant data is not available. Minimum environmental or social safeguards were not applicable.



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

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this fund have been monitored and documented on an ongoing basis.



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

Not applicable.

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

# **Schroders**



# SFDR Periodic Report

The following document has been reproduced from the Schroder International Selection Fund Annual Report. All content should be viewed in conjunction with the **Annual Report:** 

https://api.schroders.com/document-store/SISF-AR-LUEN.pdf

## **SFDR Periodic Report**

## Reference Period: 1 January 2024 - 31 December 2024

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 :** Schroder ISF Asian Opportunities **Legal Entity Identifier :** YV2UILN4DUFWUTDZHO58

#### **Environmental and/or social characteristics**

#### Sustainable Did this financial product have a sustainable investment objective? investment means an investment in an •• Yes Х No economic activity that contributes to It made sustainable investments with an X It promoted Environmental/Social (E/S) an environmental or environmental objective: % characteristics and while it did not have social objective, provided that the as its objective a sustainable investment, investment does not it had a proportion of 71% of sustainable significantly harm investments anv environmental or social objective in economic activities that qualify as with an environmental objective in and that the economic activities that qualify as environmentally sustainable under investee companies environmentally sustainable under the EU Taxonomy follow good the EU Taxonomy governance practices. in economic activities that do not with an environmental objective in X qualify as environmentally sustainable economic activities that do not under the EU Taxonomy qualify as environmentally sustainable under the EU Taxonomy X with a social objective It made sustainable investments with a It promoted E/S characteristics, but did social objective: % not make any sustainable investments

#### 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

i

Reference Period: 1 January 2024 - 31 December 2024



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

The environmental and/or social characteristics promoted by the Fund were met.

The Fund maintained a higher overall sustainability score than the MSCI AC Asia ex Japan (Net TR) Index, based on the Investment Manager's rating system. This benchmark (which is a broad market index) is not a reference benchmark for the purposes of the environmental and social characteristics promoted by the Fund.

The sustainability score is measured by Schroders' proprietary tool that provides an aggregate estimate of the social and environmental costs and benefits that an issuer may create. It does this by scoring the issuer against a list of indicators – scores may be positive (for example, when an issuer pays more than average living wages) or negative (for example, when an issuer emits carbon). It does this using third party data as well as Schroders' own estimates and assumptions and the outcome may differ from other sustainability tools and measures.

The result is expressed as an aggregate score of the sustainability indicators for each issuer, specifically a notional percentage (positive or negative) of sales of the relevant underlying issuer. For example, a score of +2% would mean that for every \$100 of sales the issuer generates, it would provide a net positive contribution to society and/or the environment of \$2. The sustainability score of the Fund is derived from the scores of all eligible issuers in the Fund's portfolio measured by Schroders' proprietary tool.

The Fund also invested at least 25% of its assets in sustainable investments during the reference period.

The reference period for this Fund is 1 January 2024 to 31 December 2024.

#### • How did the sustainability indicators perform?

The Fund's sustainability score for the reference period was 0.8% and the benchmark's sustainability score for the reference period was -2.5%. This means that the Fund's weighted average score over a rolling six month period up to the end of the reference period was higher than the benchmark's weighted average score over the same period, based on month-end data.

In each case the sustainability score is calculated as described above.

During the reference period, the top 5 indicators in Schroders' proprietary tool that contributed positively to the sustainability score of the Fund were:

- Donations
- Financial Inclusion
- High Salaries
- Innovation
- Medicine

The Investment Manager invested 71% of the Fund's assets in sustainable investments. This figure

ii

Sustainability

how the

attained.

indicators measure

environmental or social characteristics

promoted by the

financial product are

represents the average percentage of sustainable investments during the reference period, based on quarter-end data. Sustainable investments are measured by reference to the sustainability score in Schroders' proprietary tool.

The Fund also applied certain exclusions, with which the Investment Manager monitored compliance on an ongoing basis via its portfolio compliance framework.

#### • ... and compared to previous periods?

#### Sustainable investments

#### Sustainability score

This table details the percentage of assets invested in This table details the Fund's and benchmark's sustainable investments, year on year.

sustainability score, year on year.

Period	Fund	Period	Fund	Benchmark
	(%)		(%)	(%)
Jan 2024 - Dec 2024	71	Jan 2024 - Dec 2024	0.8	-2.5
Jan 2023 - Dec 2023	54	Jan 2023 - Dec 2023	-1.0	-2.4
Aug 2022 - Dec 2022	57	Jan 2022 - Dec 2022	-1.4	-2.9

For 2022 the percentage of sustainable investments was calculated as an average over the last four months of the reference period. From 2023 the percentage is calculated as an average based on quarter-end data.

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

In respect of the proportion of the Fund's portfolio that was invested in sustainable investments, each sustainable investment demonstrated a net positive effect across a range of environmental or social objectives, as scored by Schroders' proprietary tool.

The objectives of the sustainable investments that the Fund made included, but were not limited to:

- Donations: the estimated societal benefits from a company's philanthropic donations. Measured based on the monetary value of the sum donated;

- Financial Inclusion: the estimated societal benefits from the provision of financial services on local populations. Assigned in proportion to company market share of global revenue;

- High Salaries: the estimated societal benefit of paying staff above local living wages (for regions in which they operate). Assigned in proportion to the surplus companies are paying employees compared to the average living wage;

- Innovation: the estimated societal benefits arising from the investment in Research and Development (R&D). Assigned based on the unitary benefit of R&D spend, or estimated based on company patent applications; and

- Medicine: the estimated societal benefits arising from the additional social value the sale of such products and services exhibits of the wider economy. Assigned in proportion to the company's

Reference Period: 1 January 2024 - 31 December 2024

involvement in the healthcare value chain and proportion of company market share to global sub-sector revenue.

The above examples of the objectives of the sustainable investments that the Fund made during the reference period are based on the most significant objectives at each quarter-end. Other objectives may have applied during the reference period.

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

The Investment Manager's approach to not causing significant harm to any environmental or social sustainable investment objective included the following:

- Firm-wide exclusions applied to Schroders funds. These related to international conventions on cluster munitions, anti-personnel mines, and chemical and biological weapons and thermal coal mining. Further information and a list of excluded controversial weapons companies is available at https://www.schroders.com/en/sustainability/active-ownership/group-exclusions/.

- The Fund excluded companies that derive revenues above certain thresholds from activities related to tobacco and thermal coal.

- The Fund excluded companies that are assessed by Schroders to have breached one or more 'global norms' thereby causing significant environmental or social harm; these companies comprise Schroders' 'global norms' breach list. Schroders' determination of whether a company has been involved in such a breach considers relevant principles such as those contained in the UN Global Compact (UNGC) principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. The 'global norms' breach list may be informed by assessments performed by third party providers and by proprietary research, where relevant to a particular situation. In exceptional circumstances a derogation may have been applied in order to allow the Fund to continue to hold a company on Schroders' 'global norms' breach list, for example where the stated investment strategy of the Fund may otherwise be compromised. Any such company was not categorised as a sustainable investment.

- The Fund may have also applied certain other exclusions in addition to those summarised above. Further information on all of the Fund's investment exclusions is to be found under "Sustainability-Related Disclosure" on The Fund's webpage https://www.schroders.com/en-lu/lu/individual/fund-centre.

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

When seeking to identify significant harm, Schroders' approach to taking into account the Principal Adverse Impacts (PAI) indicators involved taking both a quantitative and a qualitative approach. Investee companies deemed not to satisfy the quantitative thresholds would generally have been excluded, unless on a case-by-case basis the data was deemed not representative of a company's performance in the relevant area. Where it was not considered appropriate or feasible to set quantitative thresholds, the Investment Manager engaged, where relevant, in accordance with the priorities documented in Schroders' Engagement Blueprint and/or voting policy.

This framework is subject to ongoing review, particularly as the availability and quality of the data evolves.

Our approach included:

1. Quantitative: this included indicators where specific thresholds have been established:

impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

**Principal adverse** 

### Reference Period: 1 January 2024 - 31 December 2024

- Via the application of exclusions. This approach is relevant to PAI 4 (Exposure to companies active in the fossil fuel sector), PAI 5 (Share of non-renewable energy consumption and production) and PAI 14 (Exposure to controversial weapons). Further, the following PAIs were assessed as part of Schroders 'global norms' breach list exclusion (which seeks to exclude companies where significant harm is occurring): PAI 7 (Activities negatively affecting biodiversity-sensitive areas), PAI 8 (Emissions to water), PAI 9 (Hazardous waste and radioactive waste ratio), PAI 10 (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises), PAI 11 (Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises and Voluntary) and PAI 14 in Table 3 (Number of identified cases of severe human rights issues and incidents).

- Via the application of an alert system flag if the relevant indicator(s) exceeded a threshold. These quantitative thresholds to assess significant harm are established centrally by our Sustainable Investment team and monitored systematically. This approach applies to indicators where we have segmented the population into harm groups to establish a threshold, such as carbon related PAI metrics, PAI 1 (GHG emissions), PAI 2 (Carbon footprint) and Voluntary PAI 4 in Table 2 (Investing in companies without carbon emission reduction initiatives). PAI 3 (GHG intensity of investee companies) operates in a similar way but the threshold is based on a revenue metric. A threshold for PAI 6 (Energy consumption intensity per high impact climate sector) is established based on the above mentioned carbon measures. A similar approach has been taken for PAI 15 (GHG intensity). PAI 16 (Investee countries subject to social violations) also operates in the same way but based on data availability regarding social violations. Through this process the relevant issuer(s) that were deemed not to satisfy the quantitative thresholds were flagged to the Investment Manager for consideration, whose response may have involved selling the holdings(s) or maintaining the position if on a case-by-case basis the data was deemed not representative of a company's performance in the relevant area. Investee companies deemed to cause significant harm were excluded from the Fund.

2. Qualitative: This included PAI indicators where Schroders' believed that the data available did not enable us to make a quantitative determination regarding whether significant harm was done so as to warrant excluding an investment. In such cases, the Investment Manager engaged where possible with the company or companies held, in accordance with the priorities documented in Schroders' Engagement Blueprint and/or voting policy. This approach applies to indicators such as PAI 12 (Unadjusted gender pay gap) and PAI 13 (Board gender diversity), where we engaged and used our voting rights where we considered appropriate. Both board gender diversity and disclosure of gender pay gap information are captured in our Engagement Blueprint.

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

The portion of the portfolio in sustainable investments were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Companies on Schroders' 'global norms' breach list were not categorised as sustainable investments. Schroders' determination of whether a company should be included on such list considered the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, among other relevant principles. The 'global norms' breach list was informed by third party providers and proprietary research, where relevant.

v

## Reference Period: 1 January 2024 - 31 December 2024

*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.



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

The Investment Manager's approach to considering principal adverse impacts on sustainability factors differs depending on the relevant indicator. Some indicators were considered via the application of exclusions, some were considered via the investment process and some via engagement. Further details on how these have been considered during the reference period are detailed below.

PAIs were considered as part of pre-investment through the application of exclusions. These included: - Controversial weapons: PAI 14 (Exposure to controversial weapons, such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

- Schroders' 'global norms' breach list, which covers: PAI 7 (Activities negatively affecting biodiversitysensitive areas), PAI 8 (Emissions to water), PAI 9 (Hazardous waste and radioactive waste ratio), PAI 10 (Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises), PAI 11 (Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises) and PAI 14 in Table 3 (Number of identified cases of severe human rights issues and incidents)

- Companies that derived revenues above certain thresholds from activities related to thermal coal, that were deemed by the Investment Manager to contribute significantly to climate change were excluded from the investible universe: PAIs 1, 2, 3, 4 and 5 (Greenhouse gas emissions).

During the reference period, PAIs were also considered through integration in the investment process through the bottom up stock analysis at a company level. The Asian Equities investment team used a proprietary tool which provides a framework for analysing a company's relationship with its stakeholders and the sustainability of its business model and covers PAIs 1, 2, 3 and 6 (Greenhouse gas emissions).

PAIs were also considered post-investment through engagement where the Investment Manager engaged in line with the approach and expectations set out in Schroders Engagement Blueprint, which outlines our approach to active ownership. Over the period, our engagements covered a range of topics including those related to PAIs 1, 2, 3, 5 (Greenhouse gas emissions) and 13 (Board gender diversity). All PAI indicators were monitored via Schroders PAI dashboard.

A summary of the Fund's engagement activity during the reference period, including the relevant engagement theme, is shown below:

Engagement Theme	<b># Issuers</b>
Climate Change	25
Natural Capital and Biodiversity	5

vi

Reference Period: 1 January 2024 - 31 December 2024

Human Rights	4
Corporate Governance	4
Human Capital Management	2
Diversity and Inclusion	2

The engagements shown relate to engagements with companies and issuers.

Our approach is subject to ongoing review, particularly as the availability, and quality, of PAI data evolves.

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

During the reference period the top 15 investments were:

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 1 Jan 2024 to 31 Dec 2024

Largest Investments	Sector	% Assets	Country
TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LIMITED TWD10	Information Technology	9.75	Taiwan
TENCENT HOLDINGS LIMITED HKD0.00002	Information Technology	6.54	China
SAMSUNG ELECTRONICS COMPANY LIMITED KRW100	Information Technology	6.10	South Korea
Schroder ISF Indian Opportunities I Acc USD	Collective Investments	4.99	India
Schroder ISF Asian Smaller Companies I Acc USD	Collective Investments	4.55	Luxembourg
ICICI BANK LIMITED INR2	Financial	3.45	India
HDFC BANK LIMITED INR1	Financial	3.40	India
MEDIATEK INCORPORATED TWD10	Information Technology	3.28	Taiwan
AIA GROUP LIMITED NPV	Financial	3.21	Hong Kong
APOLLO HOSPITALS ENTERPRISE LIMITED INR5	Health Care	3.04	India
TECHTRONIC INDUSTRIES COMPANY LIMITED HKD0.10	Consumer Discretionary	2.78	Hong Kong
STANDARD CHARTERED PLC USD0.50 (HONG KONG LISTING)	Financial	2.51	United Kingdom
OVERSEA-CHINESE BANKING CORPORATION LIMITED SGD0.50	Financial	2.50	Singapore
BANK MANDIRI TBK PT IDR250	Financial	2.26	Indonesia
INFOSYS LIMITED INR5 (DEMAT)	Information Technology	2.09	India

The list above represents the average of the Fund's holdings at each quarter-end during the reference period.

The largest investments and % of assets referred to above are derived from the Schroders Investment Book of Record (IBoR) data source. The largest investments and % of assets detailed elsewhere in the Audited Annual Report are derived from the Accounting Book of Record (ABoR) maintained by the administrator. As a result of these differing data sources, there may be differences in the largest

Reference Period: 1 January 2024 - 31 December 2024

investments and % of assets due to the differing calculation methodologies of these alternative data sources.

What was the proportion of sustainability-related investments?

### • What was the asset allocation?

The Fund's investments that were used to meet its environmental or social characteristics are summarised below.

#1 Aligned with E/S characteristics includes the Fund's assets that were used to attain the environmental or social characteristics, which is equal to 98%. The Fund maintained a higher overall sustainability score than the MSCI AC Asia ex Japan (Net TR) Index and so the Fund's investments that were scored by Schroders' proprietary sustainability tool are included within #1 on the basis that they contributed to the Fund's sustainability score (whether such individual investment had a positive or a negative score). The percentage in #1 Aligned E/S characteristics represents the average during the reference period, based on quarter-end data.

The Fund invested 71% of its assets in sustainable investments. This percentage represents the average during the reference period, based on quarter-end data. Within this, 15% was invested in sustainable investments with an environmental objective and 56% was invested in sustainable investments with a social objective. The percentage of sustainable investments with an environmental objective and the percentage of sustainable investments with a social objective may not sum to the percentage of sustainable investments, due to rounding. In respect of the proportion of the Fund's portfolio that was invested in sustainable investments, each sustainable investment demonstrated a net positive effect across a range of environmental or social objectives, as scored by Schroders' proprietary tool. A sustainable investment is classified as having an environmental or social objective depending on whether the relevant issuer has a higher score in Schroders' proprietary tool relative to its applicable peer group for its environmental indicators or its social indicators. In each case, indicators are comprised of both "costs" and "benefits".

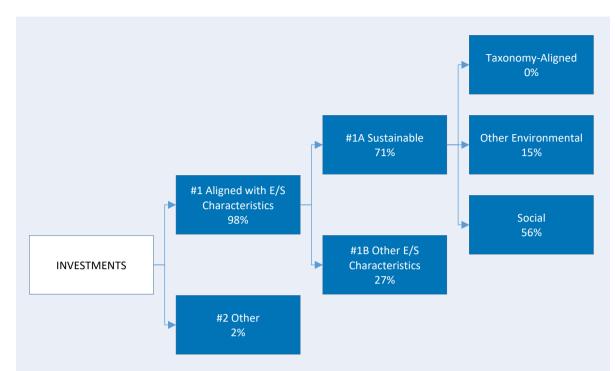
#2 Other includes cash, which was treated as neutral for sustainability purposes. #2 also includes other investments that were not scored by Schroders' proprietary sustainability tool and so did not contribute towards the Fund's sustainability score.

viii



Asset allocation describes the share of investments in specific assets.

Reference Period: 1 January 2024 - 31 December 2024



**#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 gualified as sustainable investments

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

- The sub-category #1A Sustainable covers environmentally and socially sustainable investments

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

### • In which economic sectors were the investments made?

During the reference period investments were made in the following economic sectors:

ix

Reference Period: 1 January 2024 - 31 December 2024

Sector	Sub-Sector	% Assets
Information Technology	Semiconductors & Semiconductor Equipment	22.23
Information Technology	Software & Services	9.00
Information Technology	Technology Hardware & Equipment	2.84
Financial	Banking	15.86
Financial	Insurance	5.20
Financial	Real Estate	2.83
Financial	Financial Services	0.60
Consumer Discretionary	Consumer Durables & Apparel	7.93
Consumer Discretionary	Consumer Services	4.74
Consumer Discretionary	Consumer Discretionary Distribution & Retail	3.55
Consumer Discretionary	Automobiles & Components	0.13
Collective Investments	Unit Trusts	9.54
Industrial	Capital Goods	5.45
Industrial	Transportation	0.11
Health Care	Health Care Equipment & Services	3.04
Health Care	Pharmaceuticals, Biotechnology & Life Sciences	0.20
Energy	Integrated Oil & Gas	1.65
Energy	Oil & Gas Refining & Marketing	1.36
Materials	Materials	1.86
Consumer Staples	Food, Beverage & Tobacco	1.12
Cash	Cash	0.74

The list above represents the average of the Fund's holdings at each quarter-end during the reference period.

The % of assets and sector classifications aligned to economic sectors referred to above are derived from the Schroders Investment Book of Record (IBoR) data source. The % of assets and sector classifications aligned to economic sectors detailed elsewhere in the Audited Annual Report are derived from the Accounting Book of Record (ABoR) maintained by the administrator. As a result of these differing data sources, there may be differences in the % of assets and sector classifications aligned to economic sectors, due to the differing calculation methodologies and data availability of these alternative data sources.

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

There was no extent to which the Fund's investments (including transitional and enabling activities) with an environmental objective were aligned with the EU Taxonomy. Taxonomy alignment of this Fund's investments has therefore not been calculated and has as a result been deemed to constitute 0% of the Fund's portfolio.

х

## Reference Period: 1 January 2024 - 31 December 2024

# • 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
X No	

<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 no significant harm to 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:

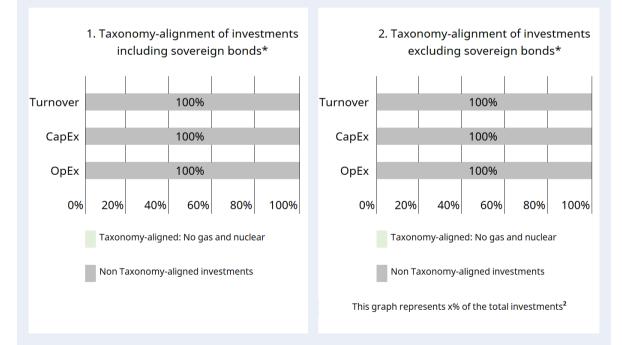
#### - turnover

reflecting the share of revenue from green activities of investee companies

### - capital

expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- operational expenditure (OpEx) reflecting green operational activities of investee companies. The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

xi

## Reference Period: 1 January 2024 - 31 December 2024

<sup>2</sup>As there is no Taxonomy-alignment, there is no impact on the graph if sovereign bonds are excluded (i.e. the percentage of Taxonomy-aligned investments remains 0%) and the Management Company therefore believes that there is no need to mention this information.

Enabling activities

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

Transitional activities are

economic activities for which lowcarbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

### • What was the share of investments made in transitional and enabling activities?

As per the above, the share of investments by the Fund in transitional and enabling activities has been deemed to constitute 0% of the Fund's portfolio.

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

This question is not applicable.

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 were not aligned with the EU Taxonomy was 15%.

Wh

What was the share of socially sustainable investments?

The share of sustainable investments with a social objective was 56%.



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

## Reference Period: 1 January 2024 - 31 December 2024

#2 Other includes cash, which was treated as neutral for sustainability purposes. #2 also includes other investments that were not scored by Schroders' proprietary sustainability tool and so did not contribute towards the Fund's sustainability score.

Minimum safeguards were applied where relevant to investments and derivatives by restricting (as appropriate) investments in counterparties where there were ownership links or exposure to higher risk countries (for the purpose of money laundering, terrorist financing, bribery, corruption, tax evasion and sanctions risks). A firm-wide risk assessment considers the risk rating of each jurisdiction; which includes reference to a number of public statements, indices and world governance indicators issued by the UN, the European Union, the UK Government, the Financial Action Task Force and several Non-Government Organisations (NGOs), such as Transparency International and the Basel Committee.

In addition, new counterparties were reviewed by Schroders' Credit Risk team and approval of a new counterparty was based on a holistic review of the various sources of information available, including, but not limited to, quality of management, ownership structure, location, regulatory and social environment to which each counterparty is subject, and the degree of development of the local banking system and its regulatory framework. Ongoing monitoring was performed through a Schroders' proprietary tool, which supports the analysis of a counterparty's management of environmental, social and governance trends and challenges.

Schroders' Credit Risk team monitored the counterparties and during the reference period, to the extent counterparties were removed from the approved list for all funds in line with our policy and compliance requirements, such counterparties were ineligible for use by the Fund in respect of any relevant investments from the date they were removed.



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

The actions taken during the reference period to meet the environmental and social characteristics promoted by the Fund were the following:

- The Investment Manager applied sustainability criteria when selecting investments for the Fund;

- The Investment Manager considered the sustainability score of the Fund and of individual investments when selecting the assets held by the Fund;

- A central good governance test was applied to assess good governance practices of investee companies; and

- The Investment Manager undertook engagements covering one or more of the six priority themes set out in our Engagement Blueprint (Link

https://mybrand.schroders.com/m/3222ea4ed44a1f2c/original/schroders-engagement-blueprint.pdf ). A summary of the Fund's engagement activity, including the number of issuers engaged with and the related theme, is shown above in the question 'How did this financial product consider principal adverse impacts on sustainability factors?'. Through our engagement activities, we build relationships and have a two-way dialogue with our investee companies.



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

Reference

No index was designated as a reference benchmark for the purpose of attaining the environmental or

Schroder ISF Asian Opportunities Audited Annual Report

xiii

Reference Period: 1 January 2024 - 31 December 2024

benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote. social characteristics promoted by the Fund.

• How does the reference benchmark differ from a broad market index?

This question is not applicable for this Fund.

# • How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

This question is not applicable for this Fund.

• How did this financial product perform compared with the reference benchmark?

This question is not applicable for this Fund.

• *How did this financial product perform compared with the broad market index?* This question is not applicable for this Fund.

xiv

# US Smaller Companies Equity Fund

Legal entity identifier: F85E3ENYORGVJ2O80L47

# Environmental and/or social characteristics

1 January to 31 December 2024

Did this financial product have a sustainable investment objective? Sustainable investment means Yes No Х an investment in an economic It made sustainable investments It promoted Environmental/Social (E/S) activity that contributes to an with an environmental characteristics and environmental or objective: % while it did not have as its objective a social objective, provided that the investment does not significantly harm sustainable investment, it had a proportion of 20.5% of sustainable investments any environmental or in economic activities that qualify social objective and with an environmental objective in as environmentally sustainable that the investee economic activities that qualify as companies follow good governance practices. under the EU Taxonomy environmentally sustainable under the EU Taxonomy in economic activities that do not The **EU Taxonomy** is a classification system qualify as environmentally with an environmental objective in sustainable under the EU economic activities that do not qualify as laid down in Taxonomy Regulation (EU) 2020/852, establishing environmentally sustainable under the EU Taxonomy a list of environmentally with a social objective sustainable economic activities. That Regulation does not include a list of Х It made sustainable investments It promoted E/S characteristics, but did socially sustainable economic activities. with a social objective: % not make any sustainable investments 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?

The Fund promoted environmental and/or social ("E/S") characteristics by committing to maintain a minimum of 10% of the value of its portfolio invested in sustainable investments. In addition, the Fund committed to maintain a minimum of 0.5% of the value of its portfolio invested in sustainable investments with an environmental objective and a minimum of 0.5% with a social objective.

During the reference period the investment manager's method of determining how assets qualify as sustainable investments changed. The investment manager continued to evaluate each issuer against the following three criteria.

- 1) Whether the issuer's activities contributed to an E/S objective.
- 2) Whether the issuer caused significant harm to any E/S objective.
- 3) Whether, if the issuer was a company, it followed good governance practices.

If each of these three criteria were satisfied, the Fund's investment in that issuer was considered a sustainable investment.

Before 30 June 2024, the investment manager's approach to measuring an issuer's contribution to an E/S objective (1) above) was based on a percentage of its revenue, or its use of proceeds, contributing to an E/S objective (revenue-based approach). For example, if 40% of an issuer's revenues contributed to an E/S objective, 40% of the value of the investment in that issuer was considered a sustainable investment.

From 1 July 2024, the investment manager's approach considered:

(i) whether more than 50% of an issuer's revenues were derived from activities contributing to an E/S objective.

(ii) whether the issuer was "Achieving" Net Zero emissions, according to the T.Rowe Price Net Zero Status Framework.

If either or both of these conditions were satisfied, the investment manager deemed the entire value to contribute to an E/S objective (pass/fail approach). More information about the investment manager's

Sustainable Investment methodology can be found in the Fund's EU SFDR Disclosure (www.troweprice.com/financial-intermediary/lu/en/funds/sfdr-disclosures.html).

Throughout the reference period the Fund held an average of 20.5% of the value of its portfolio in sustainable investments, always maintaining a minimum of 10%. The Fund held an average of 4.3% in investments with an environmental objective and 16.2% with a social objective, always maintaining a minimum of 0.5%. The Fund's sustainable investments contributed to specific E/S objectives, which are listed in the section below.

### How did the sustainability indicators perform?

The sustainability indicator performed as follows.

Throughout the reference period an average of 20.5% of the value of the Fund's portfolio was invested in securities that the investment manager identified as sustainable investments.

The percentage of the Fund's holdings in sustainable investments for each calendar quarter-end during the reference period were as follows.

	Revenue-based approach		Pass/fail approach		2024 Weighted	
	31 Mar	30 Jun	30 Sep	31 Dec	Average	
% Sustainable Investments	18.3	20.0	22.4	21.0	20.5	

T. Rowe Price calculated the proportion of sustainable investments during the reference period by using an asset-weighted average of quarter-end portfolio measurements.

### ... and compared to previous periods?

The historical values of the Fund's sustainability indicator are shown in the table below.

Period	% Sustainable Investments
2023	21.9
2024	20.5

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

The Fund invested in sustainable investments that have E/S objectives. It used the following E/S pillars that align to the UN Sustainable Development Goals ("SDGs") to determine economic activities that contributed to E/S objectives:

Pillar	Activities
Climate and resource impact	Reducing greenhouse gases Promoting healthy ecosystems Nurturing circular economies
Social equity and quality of life	Enabling social equity Improving health Enhancing quality of life

The Fund held investments in companies which, through their products or services, were aligned to economic activities that contributed to the following objectives:

- reducing greenhouse gases
- · promoting healthy ecosystems
- nurturing circular economies
- · enabling social equity
- improving health
- enhancing quality of life

Sustainability indicators measure

how the environmental or social characteristics promoted by the financial product are attained.

#### US Smaller Companies Equity Fund

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

The investment manager utilised its proprietary internal research platform to support its assessment of whether an issuer was causing significant harm to any E/S objective. Combined with third-party data, the "do no significant harm" assessment incorporated issuer information in relation to Principal Adverse Impact ("PAI") indicators and alignment to certain international guidelines and principles.

Throughout the reference period, all investments that the investment manager determined as sustainable were assessed against all relevant PAI indicators and OECD guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights. Based on this assessment, the sustainable investments held by the Fund did not significantly harm any E/S objectives.

Do No Significant Harm (DNSH)	OECD Guidelines & UN	Supply Chain	
	Guiding	Employee Treatment	
	Principles on Business and Human Rights PAI Indicators	Society & Community Relations	
		UNGC and OECD Guidelines	
		GHG Emissions	
		Biodiversity	
		Water, Waste & Material Emissions	
		Social & Employee Matters	
		Exposure to Controversial Weapons	

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

The table above illustrates the framework the investment manager applied to systematically assess DNSH as a part of their investment process, which was inclusive of both PAI indicators and OECD guidelines and human rights principles. Where issuer data for a PAI indicator was unavailable the investment manager used proxy PAI indicators that aligned to the mandatory PAI sub-categories described in the table above.

The investment manager determined whether significant harm was being caused by applying a qualitative and quantitative assessment of the data they obtained for the mandatory PAI indicators listed in Table 1 and any relevant indicators in Tables 2 and 3 of Annex I of the SFDR Delegated Regulation. The investment manager also analysed issuer PAI metrics relative to internally set thresholds, where relevant and appropriate. These thresholds provided an initial indication of whether significant harm was occurring.

The investment manager undertook further analysis to support their view, where necessary. The investment manager considered the materiality of a given indicator relative to an issuer's industry, sector, or location, which was factored into the overall determination. Where sufficient data was not available, other relevant data points were used to make an assessment.

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

Yes, all sustainable investments were aligned with the UN Guiding Principles on Business and Human Rights and related standards and OECD Guidelines for Multinational Enterprises during the reference period.

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 EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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



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

The Fund made a commitment to consider the following PAI indicators:

- violations of UN Global Compact principles (PAI #10)
- board gender diversity (PAI #13)
- exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) (PAI #14)

PAI Indicator	Unit of Measurement	Value (%)	Fund Coverage (%) <sup>*</sup>
Violations of UN Global Compact principles (PAI #10)	Percentage of Fund invested	0.0	99.0
Board gender diversity (PAI #13)	Average percentage of female board members	30.8	96.7
Exposure to controversial weapons (PAI #14)	Percentage of Fund invested	0.0	98.1

\* Fund coverage represents the proportion of investments for which PAI data is available and applicable.

The Fund considered Violations of UN Global Compact principles (PAI #10) and Exposure to controversial weapons (PAI #14) by restricting investment in companies the investment manager identified as violating these indicators. These restrictions were implemented systematically through the T. Rowe Price Responsible Exclusion List. For the reference period, the Fund's exposure to controversial weapons and violations of UN Global Compact principles was zero. Since these PAI values cannot be improved, the investment manager is not planning any engagement or investment action. The investment manager will continue to monitor these on an ongoing basis.

The Fund considered Board gender diversity (PAI #13) by periodically collecting issuer-level PAI data, aggregating the data and averaging this over the reference period to provide a fund-level view of the indicator. In accordance with its PAI policy (available at www.troweprice.com/esg), the investment manager evaluates the fund-level view at least annually to identify and prioritise stewardship or investment action, where appropriate.

Following this evaluation, the investment manager determined that no changes are needed to its engagement programme or proxy voting policies on board gender diversity, and will maintain them for the coming year.

For clarity, if evidence of insufficient board diversity is found, the investment manager generally will engage with the company and, in the case of equity holdings, generally opposes the re-elections of Governance Committee members and the lead independent director or independent Chair. Please refer to the proxy voting guidelines available here (www.troweprice.com/content/dam/trowecorp/Pdfs/esg/ proxy-voting-guidelines-TRPIM.pdf) for additional, region-specific guidelines.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

T. Rowe Price Funds SICAV - Audited Annual Report - December 2024

### US Smaller Companies Equity Fund



#### The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 1 January to 31 December 2024

Asset allocation describes the share of investments in specific

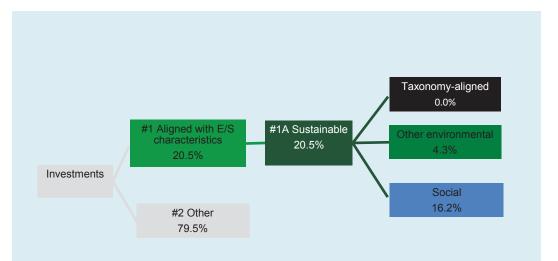
assets.

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

Largest Investments	Sector	% Assets	Country
Teledyne Technologies	Information Technology	1.4	United States
Vontier	Information Technology	1.2	United States
Element Solutions	Materials	1.2	United States
RenaissanceRe Holdings	Financials	1.1	Bermuda
Molina Healthcare	Health Care	1.1	United States
PTC	Information Technology	1.1	United States
Cooper Companies	Health Care	1.1	United States
Haemonetics	Health Care	1.0	United States
Bruker	Health Care	1.0	United States
Assurant	Financials	1.0	United States
Revvity	Health Care	1.0	United States
Atmos Energy	Utilities	1.0	United States
TechnipFMC	Energy	1.0	United Kingdom
Packaging Corporation of America	Materials	1.0	United States
Waste Connections	Industrials & Business Services	0.9	United States

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

### 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 environmentally and socially sustainable investments.

Sector	Sub-sector	% As	sets	
	Machinery	6.3		
	Trading Companies & Distributors	4.4		
	Building Products	3.0		
	Professional Services	2.0		
Industrials & Business	Ground Transportation	1.3	10.0	
Services	Commercial Services & Supplies	1.2	19.9	
	Aerospace & Defense	0.5		
	Air Freight & Logistics	0.5		
	Construction & Engineering	0.3		
	Electrical Equipment	0.2		
	Banks	6.0		
	Insurance	5.8	44.0	
Financials	Financial Services	1.5	14.6	
	Capital Markets	1.3		
	Biotechnology	4.6		
	Life Sciences Tools & Services	3.4		
	Health Care Equipment & Supplies	3.3	14.1	
Health Care	Health Care Providers & Services	1.1		
	Pharmaceuticals	1.1		
	Health Care Technology	0.5		
	Software	5.2		
	Electronic Equip, Instr & Cmpts	3.8		
Information Technology	Semiconductors & Semiconductor Equipment	3.1	12.9	
recimology	Technology Hardware, Storage & Peripherals	0.5		
	IT Services	0.3		
	Hotels Restaurants & Leisure	2.4		
	Household Durables	2.3		
	Specialty Retail	2.1		
	Textiles, Apparel & Luxury Goods	1.3		
Consumer Discretionary	Broadline Retail	0.5	9.9	
Discictionary	Automobile Components	0.5		
	Distributors	0.4		
	Diversified Consumer Services	0.4		
	Automobiles	0.0		
	Containers & Packaging	3.6		
	Metals & Mining	2.4		
Materials	Chemicals	1.8	8.9	
	Construction Materials	0.9		
	Paper & Forest Products	0.1		
_	Oil, Gas & Consumable Fuels	4.1		
Energy	Energy Equipment & Services	3.2	7.3	

### In which economic sectors were the investments made?

Sector	Sub-sector	% As	sets	
	Residential Reits	1.6		
	Real Estate Management & Development	0.9		
	Industrial Reits	0.6		
Real Estate	Retail Reits	0.6	4.9	
	Hotel & Resort Reits	0.6		
	Specialized Reits	0.5		
	Office Reits	0.1		
	Food Products	1.3		
Consumer Stanles	Consumer Staples Distribution & Retail	0.9		
Consumer Staples	Personal Care Products	0.8	3.5	
	Beverages	0.5		
	Gas Utilities	1.0		
	Water Utilities	0.6		
Utilities	Electric Utilities	0.6	2.3	
	Independent Power & Renewable Electricity Producer	0.2	2.0	
Communication	Media	0.7	0.8	
Services	Entertainment	0.1	0.8	
Cash/Reserves	Cash/Reserves	0.9	0.9	



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

The actual proportion of Taxonomy-aligned investments held by the Fund was 0.0%.

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.

Taxonomy-aligned activities are expressed as a share of: - turnover reflecting

the share of revenue from green activities of investee companies. - capital expenditure (CapEx) showing the

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- operational expenditure (OpEx)

operational activities of investee companies.

# 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
Х	No		

<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.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds*	2. Taxonomy-alignment of investments excluding sovereign bonds*
Turnover 0%	Turnover 0%
CapEx 0%	CapEx 0%
OpEx 0%	OpEx 0%
0% 50% 100% • Taxonomy-aligned investments • Other investments	0% 50% 100% • Taxonomy-aligned investments = Other investments This graph represents 100% of the total investments.

\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures (including quasi-sovereign bonds).

# *What was the share of investments made in transitional and enabling activities?* The share of investments in transitional activities was 0.0% and in enabling activities was 0.0%.

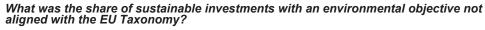
How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

Period	% Taxonomy- aligned Investments
2023	0.0
2024	0.0

### US Smaller Companies Equity Fund



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.



The share of sustainable investments with an environmental objective not aligned with the EU taxonomy was 4.3%.

Sustainable investments may not be EU Taxonomy aligned for a number of reasons, including:

- The Fund does not currently commit to investing any of its assets in investments aligned with the EU Taxonomy.
- In order to demonstrate EU Taxonomy alignment, the EU Taxonomy Regulation
  prescribes specific criteria that the investment manager must assess the assets for.
  These requirements rely heavily on data availability and reliability. Many issuers were not
  required to comply with the Taxonomy disclosure requirements during the reference
  period, making it difficult to obtain the data needed to assess Taxonomy alignment.
- Not all economic activities are covered by the EU Taxonomy as it is not possible to develop criteria for all sectors where activities could make a substantial contribution to the environment. Where developed, not all criteria were in place to apply for the reporting period.



What was the share of socially sustainable investments? The share of socially sustainable investments was 16.2%.



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

This included all other investments that were not aligned with the E/S characteristics of the Fund. These were subject to screening by the investment manager to avoid investment in issuers that the investment manager believed were harmful to the environment or society through the application of the T. Rowe Price Responsible Exclusion List. The T. Rowe Price Responsible Exclusion List is a binding exclusion list that applies directly to the Fund's entire holdings, meaning that all investment manager, the Fund may hold investments that are not relevant to the T. Rowe Price Responsible Exclusion List are not reflected as a private to the T. Rowe Price Responsible Exclusion for the investment manager, the Fund may hold investments that are not relevant to the T. Rowe Price Responsible Exclusion List (cash and certain derivatives used for efficient portfolio management). These investments are still subject to the good governance assessment, where relevant.



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

Throughout the reference period 20.5% of the value of the Fund was invested in securities that the investment manager identified as sustainable investments.

The sustainable investments were identified using the following steps.

Effective 1 July 2024 the investment manager changed its approach to measuring an issuer's contribution to an E/S objective.

Before 30 June 2024, an issuer's contribution to an E/S objective was based on the percentage of its revenue, or its use of proceeds, contributing to an E/S objective (revenue-based approach).

From 1 July 2024, the investment manager considered:

(i) whether more than 50% of an issuer's revenues were derived from activities contributing to an E/S objective.

(ii) whether the issuer was "Achieving" Net Zero emissions, according to the T.Rowe Price Net Zero Status Framework.

If either or both of these conditions were satisfied, the investment manager deemed the issuer to contribute entirely to an E/S objective (pass/fail approach).

The investment manager has adopted a robust process to consistently identify whether a company caused significant harm to an E/S objective and incorporates PAIs into that assessment, where appropriate on an issuer-by-issuer basis. Its "do no significant harm" assessment was comprised of both proprietary research and third-party data inputs, including data in relation to PAI where relevant to the issuer and/or sector. The investment manager assessed whether the company caused significant harm by setting and monitoring thresholds, where relevant and appropriate, relative to PAI indicators, and whether it was involved in significant controversies related to the OECD guidelines for multinational enterprises and UNGPs on business and human rights. If the activity breached the set thresholds, regardless of the asset's alignment to an E/S objective, the company failed the sustainable investment test.

The investment manager also assessed the governance practices of an investee company by undertaking:

- A quantitative review using their good governance test which consisted of weighted pillars designed to measure specific corporate governance risks, rolled up to an overall rating, and
- A qualitative review by the governance team if a company's good governance test rating was red, taking into account market and sector norms.

All investments held by the Fund that contributed to a specific E/S objective and passed "do no significant harm" as well as good governance assessments, as detailed above, contributed towards the Fund's overall exposure to sustainable investments.



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

A reference benchmark was not used for the purpose of promoting the Fund's E/S characteristics.

### Reference

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

#### Annex IV

Template 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: TRIGON - New Europe Fund

Legal entity identifier: 529900TCN22XTOQUBM95

#### Environmental and/or social characteristics

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

•• Yes	• • X No
It made sustainable investments with an environmental objective: %	It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 0.00% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy in economic activities that do not	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
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 made sustainable investments with a social objective: %	<ul> <li>It promoted E/S characteristics, but did not make any sustainable investments</li> </ul>



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

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.

practices.

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

The sub-fund promotes among other factors environmental and social characteristics when making investments, for example by including investments based on the sustainability factors and by excluding investments in certain activities and by applying ESG scores for investments. The sub-fund preferentially allocates capital to companies that operate in a sustainable way; minimise GHG emissions, energy and water use; minimise environmental & social harm; and, where reasonable to do so, promote positive social impact on their surrounding communities.

Specifically, the sub-fund promotes the following characteristics:

Environmental - waste;

Environmental - greenhouse gas emissions;

Social – inequality;

Social - labour relations:

The sub-fund does not have a reference benchmark for the purpose of attaining the environmental or

TRIGON - New Europe Fund

social characteristics promoted by the financial product. The sub-fund seeks to influence portfolio companies' and issuers' sustainability practices through engagement.

#### How did the sustainability indicators perform?

The development of the sustainability indicators was calculated and provided by the outsourced fund management or by the investment advisor used.

…and compared to previous periods?

N/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?

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.

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

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.

\_ How were the indicators for adverse impacts on sustainability factors taken into account?

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.

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

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.

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 EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU 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.



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

The Fund Manager commits to consider principle adverse impacts ("PAI") at entity level under Article 4 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 ("SFDR"). PAI indicators set out in Annex I of the Regulatory Technical Standards are collected, assessed and recorded for all investee companies.

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Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

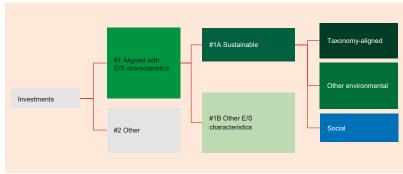
As an integral part of this, the sub-fund considers principal adverse impacts on sustainability factors at sub-fund level in accordance with Article 7 of SFDR and will publish information on the principal adverse impacts on sustainability factors in its periodic reports in accordance with Article 11. The analysis of principal adverse impacts on sustainability factors is done by various ways, for example by using third-party providers for obtaining data supported by internal analysis and dialogue with companies. Considering principal adverse impacts may also lead to excluding certain investments.

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



# What was the proportion of sustainability-related investments?

#### What was the asset allocation?



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

01/01/2024 - 31/12/2024

-7

Asset allocation

describes the share of investments in specific assets.

**#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. The share of these investments as of the reporting date is 91.46%.

**#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 share of these investments as of the reporting date is 8.54%.

The category **#1 Aligned with E/S characteristics** covers: - The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments. The share of these investments as of the reporting date is 0.00%.

 The sub-category #1B Other E/S characteristics covers investments aligned with the environmental
or social characteristics that do not qualify as sustainable investments. The share of these investments as of the reporting date is 91.46%.

### In which economic sectors were the investments made?

In addition, 8,97% of investments were made in the fossil fuels sector in the reporting period. This share includes companies that generate revenue in the area of fossil fuels, including the extraction, processing, storage and transportation of oil products, natural gas and thermal and metallurgical coal.

Sector	Sub-sector	% Assets
****** nicht definiert *****	****** nicht definiert ******	0.06
ACCOMMODATION AND FOOD SERVICE ACTIVITIES	Holiday and other short- stay accommodation	0.88
CONSTRUCTION	Construction of residential and non-residential buildings	0.33
CONSTRUCTION	Construction of roads and motorways	1.02
ELECTRICITY, GAS, STEAM AND AIR CONDITIONING SUPPLY	Distribution of electricity	0.68
ELECTRICITY, GAS, STEAM AND AIR CONDITIONING SUPPLY	Production of electricity	1.45
ELECTRICITY, GAS, STEAM AND AIR CONDITIONING SUPPLY	Trade of electricity	0.93
FINANCIAL AND INSURANCE ACTIVITIES	Activities of holding companies	10.89
FINANCIAL AND INSURANCE ACTIVITIES	Non-life insurance	3.45
FINANCIAL AND INSURANCE ACTIVITIES	Other activities auxiliary to financial services, except insurance and pension funding	1.24
FINANCIAL AND INSURANCE ACTIVITIES	Other monetary intermediation	23.22
INFORMATION AND COMMUNICATION	Computer programming activities	4.46
INFORMATION AND COMMUNICATION	Wired telecommunications activities	2.57
MANUFACTURING	Manufacture of agricultural and forestry machinery	0.80
MANUFACTURING	Manufacture of basic precious and other non- ferrous metals	1.00
MANUFACTURING	Manufacture of domestic appliances	0.16
MANUFACTURING	Manufacture of motor vehicles	2.51
MANUFACTURING	Manufacture of pharmaceutical preparations	7.67
MANUFACTURING	Manufacture of refined petroleum products	5.09
MANUFACTURING	Manufacture of soft drinks; production of mineral waters and other bottled waters	1.39
MANUFACTURING	Manufacture of tools	0.95
MINING AND QUARRYING	Extraction of natural gas	2.96
MINING AND QUARRYING	Mining of hard coal	0.93

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MINING AND QUARRYING	Mining of uranium and thorium ores	3.55
PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	Activities of head offices	8.38
TRANSPORTATION AND STORAGE	Sea and coastal passenger water transport	0.86
TRANSPORTATION AND STORAGE	Service activities incidental to water transportation	0.75
WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	Other retail sale of new goods in specialised stores	2.93
WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	Retail sale of clothing in specialised stores	4.37
WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	Retail sale via mail order houses or via Internet	0.25
WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	Wholesale trade of motor vehicle parts and accessories	1.00

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** economic activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance. To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The share of taxonomy-compliant investments was calculated on the basis of the total portfolio or the total portfolio excluding government issuers. The evaluation of the investments with regard to the previously mentioned asset allocation in "#1 Aligned with environmental or social characteristics", "#2 Other investments" and "#1A Sustainable investments" was not taken into account.

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
XNO	

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

<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.

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

Enabling Activities: 0,00 % Transitional Activities: 0,00 %

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

N/A

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

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.



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

Environmental/social characteristics are promoted with the financial product, but no sustainable investments are made.



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

Category "#2 Other" includes investments that due to the asset class type do not promote environmental or social characteristics or investments which do not have sufficient data to confirm whether these promote environmental or social characteristics or not. For example, the sub-fund may use cash and derivative instruments for liquidity and hedging purposes that may not have minimum environmental or social safeguards.

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

are sustainable

investments with an



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

During the reporting period, the fund actively incorporated ESG criteria in investment decisions, engaged with companies on sustainability improvements, exercised shareholder rights to advocate for positive change, and enhanced transparency in reporting. These efforts align with the fund's commitment to promoting environmental and social characteristics as required under Article 8 SFDR.



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

No reference value was determined as part of the sustainability strategy.

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

- How does the reference benchmark differ from a broad market index?
  N/A
- How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

No reference value was determined as part of the sustainability strategy.

How did this financial product perform compared with the reference benchmark?

No reference value was determined as part of the sustainability strategy.

How did this financial product perform compared with the broad market index?

No reference value was determined as part of the sustainability strategy.

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