

## Vontobel Fund – Euro Corporate Bond

### Legal Document:

### SFDR Website Disclosure for Article 8 financial products

#### Summary

The Sub-Fund promotes social transition through empowerment with a focus on pre-defined empowerment indicators. The Investment Manager will favor issuers that perform well in such indicators or are on their way to perform well in these indicators while excluding any issuers that are not aligned with the strategy. Issuers will be selected based on the Investment Manager's ESG framework.

In addition, the Sub-Fund will partially (10% of NAV) invest in sustainable investments by investing in securities of issuers that provide solutions to environmental and social challenges, namely to at least one of the actionable themes: climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment.

By following this process, the Investment Manager promotes a combination of environmental (such as "greenhouse gas emissions", "biodiversity" or "waste") and social characteristics (such as "inequality", "labour relations", "investment in human capital"), for example because these aspects are integrated in the Investment Manager's ESG assessment framework or because some of the applied mechanisms relate directly to one of these characteristics. The ESG assessment framework may not include all of these characteristics as the aspects considered in this process may depend for example on the sector or geography the issuer is operating in.

In order to attain the environmental and social characteristics, the Sub-Fund applies the following ESG framework:

#### Exclusion approach:

The Sub-Fund excludes:

- securities of corporate issuers involved in products and activities related to: unconventional / controversial weapons (0%), nuclear weapons (0%), conventional weapons (10%), nuclear weapons (0%), coal extraction (thermal, 10%) and coal power generation (thermal, 25%), tobacco (5%), adult entertainment (5%), gambling (5%). The percentage indicated in the context of the exclusions reflect the revenue thresholds applied related to the production of such products and/or activities. For selected products and/or activities, additional limits apply as described below.

#### Monitoring of critical controversies:

- The Investment Manager has established a monitoring process to track incidents or ongoing situations in which an issuer's activities may have adverse effects on environmental, social, and governance aspects. This process intends to ensure the alignment with global norms such as the UN Global Compact principles, the OECD Guidelines for Multi-national Enterprises, and the UN Guiding Principles on Business and Human Rights. This process is initially based on the utilization of third-party data and subsequently entails a comprehensive structured review conducted by the Investment Manager. Securities of issuers are excluded where the Investment Manager has concluded that they (i) violate the norms and standards promoted by the Sub-Fund or (ii) are involved in critical controversies, including those related to governance matters. However, the Investment Manager recognizes that excluding such issuers from the Investment Manager's investments may not always be the best approach to mitigate the adverse effects of their activities. In these cases, the Investment Manager will monitor these issuers, where the Investment Manager believes that reasonable progress can be attained, for example, through active ownership activities, provided the issuer demonstrates good governance.

#### Screening:

- Issuer's performance on pre-defined empowerment related indicators: The Sub-Fund promotes social transition through empowerment and focuses on pre-defined empowerment indicators, i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training provided by specialized third party ESG research organizations. In order to qualify for investment, the issuer must meet one of the following criteria: (i) Good performance: The issuer performs well in these indicators based on the Investment Manager's analysis; (ii) In transition: The issuer is on its way to perform well (i.e. first improvements visible) in these indicators, based on the Investment Manager's analysis; (iii) Potential identified: Where the Investment Manager has identified potential for improvement, exceptions can be made for companies that perform poorly on empowerment related issues or lack transparency on these issues. In that case, more insights will be requested, issues of concern will be addressed, and progress will be expected.

Additionally, the Sub-Fund follows an active ownership approach, which takes into account relevant environmental, social and governance matters. The Investment Manager sees these activities as a way to support the attainment of the environmental and social characteristics promoted by the Sub-Fund. The Sub-Fund is covered by the engagement pool of the Investment Manager's stewardship program, which is mainly based on a collaboration with a stewardship partner. The Investment Manager has limited influence on the stewardship partner's engagement program.

The binding elements of the investment strategy used to select the investments to achieve the E/S characteristics promoted are as follows:

- The Sub-Fund excludes securities of corporate issuers that derive a non-negligible part of their revenues from excluded products and/or activities listed above.
- The Sub-Fund excludes securities of issuers that are in violation of certain global norms and standards promoted by the Sub-Fund or that are exposed to critical controversies (unless the Investment Manager believes reasonable progress can be attained, for example, through active ownership activities). Such controversies may be related to environmental, social or governance issues.
- The Sub-Fund invests in securities of corporate issuers that, in respect to the pre-defined empowerment related indicators (i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training provided by specialized third party ESG research), (i) perform well, or (ii) are on their way to perform well in these indicators, or (iii) where potential for improvement has been identified, based on the Investment Manager's analysis.
- The Sub-Fund will have at least the same ESG score (the UN Global Compact profile) as the investment universe (i.e. euro investment grade corporate debt market).
- The ESG analysis covers at least:
  - 90% of the Sub-Fund's (as eligible) equities issued by large cap companies whose registered office is located in developed market countries, sovereign debt issued by developed market countries and debt securities and money market instruments with an investment grade credit rating.
  - 75% of the Sub-Fund's (as eligible) equities issued by large cap companies whose registered office is located in emerging market countries, equities issued by small and mid-cap companies, sovereign debt issued by emerging market countries and debt securities and money market instruments with a high yield credit rating.

The use of ESG data may be subject to methodological limits.

Finally, in an effort to measure the attainment of each of the E/S characteristics promoted, the Sub-Fund will report on the defined sustainability indicators as part of its annual periodic reporting. The sustainability indicators are derived from the binding elements of the investment strategy used to select the investments to achieve the promoted E/S characteristics.

### **No sustainable investment objective**

This Sub-Fund promotes environmental or social characteristics but does not have as its objective a sustainable investment.

While the Sub-Fund does not have as its objective a sustainable investment, it will invest at least 5% in sustainable investments by investing in securities of issuers that provide solutions to environmental and social challenges, namely to at least one of the actionable themes: climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment. The assessment methodology is described below.

In order to ensure that the sustainable investments that the Sub-Fund intends to make do not cause significant harm to any environmental or social investment objective, the Sub-Fund takes into account all the mandatory indicators for adverse impacts and ensures that the Sub-Fund's investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

*How have the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

For the portion of sustainable investments, the Investment Manager takes into account all the mandatory adverse impact indicators and any relevant additional adverse impact indicators by applying the following process:

The Investment Manager identifies issuers that are exposed to principal adverse impacts on sustainability factors based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. When no reliable third-party data is available, the Investment Manager may make reasonable estimates or assumptions.

Where the Investment Manager identifies an investment as having critical and poorly managed impact in one of the considered principal adverse impacts areas, and where no signs of remedial action or improvement have been observed, an action by the Investment Manager must be taken. Action mechanisms may include: exclusion, active ownership, tilting.

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

The Investment Manager has established a monitoring process to track incidents or ongoing situations in which an issuer's activities may have adverse effects on environmental, social, and governance aspects. This process intends to ensure the alignment with global norms such as the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. This process is initially based on the utilization of third-party data and subsequently entails a comprehensive structured review conducted by the Investment Manager. Securities of issuers are excluded where the Investment Manager has concluded that they (i) violate the norms and standards promoted by the Sub-Fund or (ii) are involved in critical controversies, including those related to governance matters. However, the Investment Manager recognizes that excluding such issuers from the Investment Manager's investments may not always be the best approach to mitigate the adverse effects of their activities. In these cases, the Investment Manager will monitor these issuers, where the Investment Manager believes that reasonable progress can be attained, for example, through active ownership activities, provided the issuer demonstrates good governance.

### **Environmental or social characteristics of the financial product**

*What are the environmental or social characteristics promoted by this financial product?*

The Sub-Fund promotes social transition through empowerment with a focus on pre-defined empowerment indicators. The Investment Manager will favor issuers that perform well in such indicators or are on their way to perform well in these indicators while excluding any issuers that are not aligned with the strategy. Issuers will be selected based on the Investment Manager's ESG framework.

In addition, the Sub-Fund will partially (10% of NAV) invest in sustainable investments by investing in securities of issuers that provide solutions to environmental and social challenges, namely to at least one of the actionable themes: climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment.

By following this process, the Investment Manager promotes a combination of environmental (such as "greenhouse gas emissions", "biodiversity" or "waste") and social characteristics (such as "inequality", "labor relations", "investment in human capital"), for example because these aspects are integrated in the Investment Manager's ESG assessment framework or because some of the applied mechanism relate directly to one of these characteristics. The ESG assessment framework may not include all of these characteristics as the aspects considered in this process may depend for example on the sector or geography the issuer is operating in.

## Investment strategy

*What investment strategy does this financial product follow to select the investments to attain the environmental and social characteristics, and what are the binding elements of this investment strategy?*

In order to attain the environmental and social characteristics, the Sub-Fund applies the following ESG framework:

### Exclusion approach:

The Sub-Fund excludes:

- securities of corporate issuers involved in products and activities related to: unconventional / controversial weapons (0%), nuclear weapons (0%), conventional weapons (10%), nuclear weapons (0%), coal extraction (thermal, 10%) and coal power generation (thermal, 25%), tobacco (5%), adult entertainment (5%), gambling (5%). The percentage indicated in the context of the exclusions reflect the revenue thresholds applied related to the production of such products and/or activities. For selected products and/or activities, additional limits apply as described below.

The exclusion listed below are applied with the revenue thresholds indicated<sup>1</sup>:

EXCLUSION	CRITERIA	EXCEPTIONS APPLIED?
<b>Sector/business activity-based exclusions</b>		
Adult entertainment	Production: 5% of revenues Downstream: 25% of revenues	None.
Conventional weapons, incl. firearms	Production: 10% of revenues	None.
Coal (thermal)	Production: 10% of revenues	None.
Coal power	Production: 25% of revenues	None.
Gambling	Upstream: 25% of revenues Production: 5% of revenues	None.
Nuclear weapons	Production: 0% of revenues	None.
Tobacco	Upstream: 25% of revenues Production: 5% of revenues Downstream: 25% of revenues	None.
Unconventional / controversial weapons	Production: 0% of revenues	None.

### Screening:

- Issuer's performance on pre-defined empowerment related indicators: The Sub-Fund promotes social transition through empowerment and focuses on pre-defined empowerment indicators, i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training provided by specialized third party ESG research organizations. In order to qualify for investment, the issuer must meet one of the following criteria: (i) Good performance: The issuer performs well in these indicators based on the Investment Manager's analysis; (ii) In transition: The issuer is on its way to perform well (i.e. first improvements visible) in these indicators, based on the Investment Manager's analysis; (iii) Potential identified: Where the Investment Manager has identified potential for improvement, exceptions can be made for companies that perform poorly on empowerment related issues or lack transparency on these issues. In that case, more insights will be requested, issues of concern will be addressed, and progress will be expected.

<sup>1</sup> The Investment Manager may apply exclusions to any three parts of the value chain or a combination. For example, Upstream could be financing including significant ownership of activities in the sector. Downstream could be distribution of products and services from the sector. The categories 'Upstream', 'Production', and 'Downstream' are used in the European ESG Template, and are included in this report for consistency.

**Monitoring of critical controversies:**

- The Investment Manager has established a monitoring process to track incidents or ongoing situations in which an issuer's activities may have adverse effects on environmental, social, and governance aspects. This process intends to ensure the alignment with global norms such as the UN Global Compact principles, the OECD Guidelines for Multi-national Enterprises, and the UN Guiding Principles on Business and Human Rights. This process is initially based on the utilization of third-party data and subsequently entails a comprehensive structured review conducted by the Investment Manager. Securities of issuers are excluded where the Investment Manager has concluded that they (i) violate the norms and standards promoted by the Sub-Fund or (ii) are involved in critical controversies, including those related to governance matters. However, the Investment Manager recognizes that excluding such issuers from the Investment Manager's investments may not always be the best approach to mitigate the adverse effects of their activities. In these cases, the Investment Manager will monitor these issuers, where the Investment Manager believes that reasonable progress can be attained, for example, through active ownership activities, provided the issuer demonstrates good governance.

**Partial investments in sustainable investments:**

- The Sub-Fund invests at least 10% of its net assets in securities of issuers that provide solutions to environmental and social challenges, namely to at least one of the actionable themes: climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment. The assessment methodology is described above.

**Sub-Fund level commitments:**

- The Sub-Fund will have at least the same ESG score (the UN Global Compact profile) as the investment universe (i.e. euro investment grade corporate debt market).

**Binding elements:**

The binding elements of the investment strategy used to select the investments to achieve the E/S characteristics promoted are as follows:

- The Sub-Fund excludes securities of corporate issuers that derive a non-negligible part of their revenues from excluded products and/or activities listed above.
- The Sub-Fund excludes securities of issuers that are in violation of certain global norms and standards promoted by the Sub-Fund or that are exposed to critical controversies (unless the Investment Manager believes reasonable progress can be attained, for example, through active ownership activities). Such controversies may be related to environmental, social or governance issues.
- The Sub-Fund invests in securities of corporate issuers that, in respect to the pre-defined empowerment related indicators (i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training provided by specialized third party ESG research), (i) perform well, or (ii) are on their way to perform well in these indicators, or (iii) where potential for improvement has been identified, based on the Investment Manager's analysis.
- The Sub-Fund partially invests in securities of issuers that provide solutions to environmental and social challenges, namely the actionable themes (climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment) and that qualify as sustainable investments. The issuer should either already provide solutions to at least one of the actionable themes, or on the way to launch such solutions.
- The Sub-Fund will have at least the same ESG score (the UN Global Compact profile) as the investment universe (i.e. euro investment grade corporate debt market).
- The ESG analysis covers at least:
  - 90% of the Sub-Fund's (as eligible) equities issued by large cap companies whose registered office is located in developed market countries, sovereign debt issued by developed market countries and debt securities and money market instruments with an investment grade credit rating.
  - 75% of the Sub-Fund's (as eligible) equities issued by large cap companies whose registered office is located in emerging market countries, equities issued by small and mid-cap companies, sovereign debt issued by emerging market countries and debt securities and money market instruments with a high yield credit rating.

The use of ESG data may be subject to methodological limits.

*What is the policy to assess good governance practices of the investee companies<sup>2</sup>?*

The Investment Manager will assess investee companies' good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance, by applying a monitoring process of critical controversies. The Investment Manager has established a monitoring process to track incidents or ongoing situations in which an issuer's activities may have adverse effects on environmental, social, and governance aspects. This process intends to ensure the alignment with global norms such as the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. This process is initially based on the utilization of third-party data and subsequently entails a comprehensive structured review conducted by the Investment Manager. Securities of issuers are excluded where the Investment Manager has concluded that they (i) violate the norms and standards promoted by the Sub-Fund or (ii) are involved in critical controversies, including those related to governance matters. However, the Investment Manager recognizes that excluding such issuers from the Investment Manager's investments may not always be the best approach to mitigate the adverse effects of their activities. In these cases, the Investment Manager will monitor these issuers, where the Investment Manager believes that reasonable progress can be attained, for example, through active ownership activities, provided the issuer demonstrates good governance. The Sub-Fund further intends to ensure good governance of the investee companies via active ownership. The Investment Manager puts best effort in engagement with regards to ESG policies and to promote sustainability awareness.

*Does the financial product consider Principal Adverse Sustainability Impacts? If yes, which areas/indicators are considered and how?*

Yes  No

The Investment Manager considers the list of principal adverse impacts on sustainability factors mentioned in the table below.

The Investment Manager identifies issuers that are exposed to principal adverse impacts on sustainability factors based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. When no reliable third-party data is available, the Investment Manager may make reasonable estimates or assumptions.

Where the Investment Manager identifies an investment as having a critical and poorly managed impact in one of the considered principal adverse impacts areas, and where no signs of remedial action or improvement have been observed, an action by the Investment Manager must be taken. Action mechanisms may include: exclusion, active ownership, tilting.

Information on how principal adverse impacts on sustainability factors were considered will be made available in the periodic reporting of the Sub-Fund.

The following *Principal Adverse Sustainability Impacts* Indicators<sup>3</sup> are considered in the investment strategy:

**TABLE # PRINCIPAL ADVERSE IMPACT INDICATOR**

<b>Biodiversity</b>	
1	7 Activities negatively affecting biodiversity-sensitive areas
<b>Water</b>	
1	8 Emissions to water
<b>Waste and resources</b>	
1	9 Hazardous waste and radioactive waste ratio
<b>Controversial weapons</b>	
1	14 Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
<b>Social and employee rights</b>	
1	10 Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
1	13 Board gender diversity
<b>Social aspects - sovereigns and supranationals</b>	
1	16 Investee countries subject to social violations

<sup>2</sup> including with respect to sound management structures, employee relations, remuneration of staff and tax compliance

<sup>3</sup> As set out in Table 1, 2 and 3 of Annex 1 of Regulation (EU) 2022/1288

## Proportion of investments

*What is the asset allocation planned for this financial product?*

INVESTMENTS	PERCENTAGE (OF NET ASSETS)	TYPE OF EXPOSURES
#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.	At least 75%	Only through direct exposures
#1A Sustainable Covers sustainable investments with environmental or social objectives.	At least 5%	Only through direct exposures
Environmental objective		
Other environmental	At least 1%	Only through direct exposures
Social objective	At least 1%	Only through direct exposures
#1B Other E/S characteristics Covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments	Up to 95%	Only through direct exposures
#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.	Up to 25%	Through direct exposures for unscreened investments, through indirect exposures for hedging instruments.

Under “#2 Other”, the Sub-Fund may hold ancillary liquidity and use financial derivative instruments for the investment and hedging purposes. While these instruments are not expected to detrimentally affect the attainment of the Sub-Fund’s environmental and social characteristics, no minimum environmental or social safeguards are applied. Other investments include also unscreened investments for diversification purposes or investments for which ESG data is lacking. For such instruments the monitoring process of critical controversies is applied.

Derivatives are not used for the purpose of attaining the environmental and/or social characteristics promoted by the Sub-Fund.

## Monitoring of environmental or social characteristics

*What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?*

The attainment of the environmental and social characteristics is measured through the following list of sustainability indicators:

- Percentage of investments in securities of corporate issuers that derive a non-negligible part of their revenues from products and/or activities excluded by the Sub-Fund (excluded products and /or activities are indicated under the investment strategy section).
- Percentage of investments in issuers that are in violation of certain critical controversies global norms and standards promoted by the Sub-Fund or that are exposed to critical controversies (unless the Investment Manager believes reasonable progress can be attained, for example, through active ownership activities). Such controversies may be related to environmental, social or governance issues
- Percentage of investments in securities of corporate issuers that, in respect to the pre-defined empowerment related indicators (i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training provided by specialized third party ESG research), (i) perform well, or (ii) are on their way to perform well in these indicators, or (iii) where potential for improvement has been identified, based on the Investment Manager’s analysis
- Percentage of investments in securities of issuers that provide solutions to at least one of the actionable themes (climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment) and that qualify as sustainable investments
- Sub-Fund’s weighted average UN Global Compact profile, compared to the investment universe (i.e. euro investment grade corporate debt market)
- Percentage of securities covered by ESG analysis

*How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?*

The information used for the implementation of the ESG framework, and consequently the attainment of the environmental and social characteristics, are reviewed on a regular basis.

If a security does not comply with the binding criteria described below, the Investment Manager divests from such an issuer within a time period to be determined by the Investment Manager without exceeding in principle three months after such breach was detected, considering prevailing market conditions, and taking due account of the best interests of the shareholders. The Board of Directors or the Management Company of Vontobel Fund may decide to further postpone the rectification of such a breach or decide to carry out the divestment in several instalments over a longer period of time in exceptional cases, provided this is considered to be in the best interests of the shareholders.

Compliance with the binding elements applied by this Sub-Fund is monitored by the investment teams. For the elements that are in scope of the Sub-Fund's investment guidelines and subject to investment controls, the internal Investment Control unit has post-trade checks mechanisms in place. The independent Investment Control team conducts a daily post-trade review of portfolios using our portfolio management system. Should Investment Control and the respective portfolio manager fail to agree whether a breach has actually occurred (e.g. in case of a different interpretation of regulatory investment restrictions), Compliance analyses the case and then informs Investment Control of its assessment, which then follows up accordingly. The pre- and post-trade checks are parametrized either based on data retained directly from third-party ESG data provider or from the Investment Manager directly, especially where the followed approaches are based on proprietary methodologies of the Investment Manager. For documented ESG processes and controls, first line of defense controls are confirmed and self-assessed annually by the business owners via the Operation Risk and Control Self-Assessment (RCSA) process. The RCSA process is a systematic and regular business process aimed at reviewing specific inherent operational risks that Asset Management investments are exposed to, as well as an assessment of the control environment that is in place to mitigate those risks. Second line functions like Compliance carry out spot checks on some first line of defense controls.

## **Methodologies**

*What are the methodologies used for the implementation of the ESG framework?*

**Exclusion approach:**

The Investment Manager retains data from third party data provider in order to analyze an issuer's exposure to activities excluded by the Sub-Fund, based on pre-defined thresholds. In order to qualify for initial investment, the issuer must not breach any of these exclusion criteria. The third-party data providers are MSCI and Sustainalytics.

**Screening:**

Issuer's performance on pre-defined empowerment related indicators: the Sub-Fund promotes social transition through empowerment and focuses on pre-defined empowerment indicators, i.e. diversity oversight by management and programs, percentage of women in total workforce, ILO Labor core convention violations and percentage of employees to receive training, which is provided by specialized third party ESG research organizations. In order to qualify for investment, the issuer must meet one of the following criteria: (i) Good performance: the issuer performs well in these indicators based on the Investment Manager's analysis; (ii) In transition: The issuer is on its way to perform well (i.e. first improvements visible) in these indicators, based on the Investment Manager's analysis; (iii) Potential identified: Where the Investment Manager has identified potential for improvement, exceptions can be made for companies that perform poorly on empowerment related issues or lack transparency on these issues. In that case, more insights will be requested, issues of concern will be addressed, and progress will be expected.

**Monitoring of critical controversies:**

The Investment Manager has established a monitoring process to track incidents or ongoing situations in which an issuer's activities may have adverse effects on environmental, social, and governance aspects. This process intends to ensure the alignment with global norms such as the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

This process is initially based on the utilization of third-party data and subsequently entails a comprehensive structured review conducted by the Investment Manager. Securities of issuers are excluded where the Investment Manager has concluded that they (i) violate the norms and standards promoted by the Sub-Fund or (ii) are involved in critical controversies, including those related to governance matters. However, the Investment Manager recognizes that excluding such issuers from the Investment Manager's investments may not always be the best approach to mitigate the adverse effects of their activities. In these cases, the Investment Manager will monitor these issuers, where the Investment Manager believes that reasonable progress can be attained, for example, through active ownership activities, provided the issuer demonstrates good governance.

*Partial investments in sustainable investments:*



At least 5% of the investments in securities of issuers will be made in issuers that provide solutions to environmental and social challenges, namely to at least one of the actionable themes: climate change mitigation, responsible use of natural resources, addressing basic needs, empowerment.

To qualify for investment, the issuer should either already provide solutions to at least one of the actionable themes, or on the way to launch such solutions. Accordingly:

- The Investment Manager conducts the assessment based on quantitative ESG indicators and qualitative assessment of products, technologies, services, or projects. The qualitative assessment considers research related to peer group and scientific studies.
- The Investment Manager requires a minimum threshold of 20% of revenues, capital expenditure or allocated funding

*Sub-Fund level commitments:*

The Sub-Fund will have at least the same ESG score (the UN Global Compact profile) as the investment universe (i.e. euro investment grade corporate debt market).

### **Data sources and processing**

*What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?*

The following data sources are used for the implementation of the investment process:

- External ESG data providers including Sustainalytics, MSCI ESG Research, SynTao Green Finance, Inrate, ISS ESG, Freedom House and RepRisk
- Information provided directly by the issuers, media, NGOs, international organizations

In order to ensure data quality, the Investment Manager:

- Regularly reviews data
- Uses multiple data sources
- May directly engage with the issuers when data gaps occur

The data sources mentioned above are used in order to implement the ESG framework described in detail the “Investment strategy” section.

The Investment Manager may make reasonable estimates, when data is lacking. Additionally, third party ESG data provider may use estimates themselves. The proportion of data that is estimated by the Investment Manager is indicated to be low to medium, depending on the data type.

### **Limitations to methodologies and data**

*What are the limitations to the methodologies and data sources?*

In assessing the eligibility of an issuer based on ESG research, there is a dependence upon information and data from third party ESG research data providers and internal analyses which may be based on certain assumptions or hypothesis that render it incomplete or inaccurate. As a result, there is a risk of inaccurately assessing a security or issuer. There is also a risk that the Investment Manager may not apply the relevant criteria of the ESG research correctly or that the Sub-Fund could have indirect exposure to issuers who do not meet the relevant criteria. This poses a significant methodological limit to the ESG strategy of the Sub-Fund. Neither the Sub-Fund, nor the management company nor the investment manager make any representation or warranty, express or implied, with respect to the fairness, correctness, accuracy, reasonableness, or completeness of an assessment of ESG research and the correct execution of the ESG strategy.

In order to maintain confidence that social and environmental characteristics are met, the investment manager may also engage with investees in order to fill data gaps or may use complimentary data from additional providers or directly from investee disclosures.

### Due diligence

*What is the due diligence carried out on the underlying assets at initial investment and what are the internal and external controls in place?*

In order to qualify for initial investment, the investments aligned with the environmental and social characteristics must comply with the binding elements applied by the Sub-Fund. This compliance has to be ensured by the Investment Manager. For the elements that are in scope of the Sub-Fund's investment guidelines and subject to investment controls, the internal Investment Control unit has pre-trade checks mechanisms in place. The pre-trade checks allow portfolio managers to simulate trades and check each trade against restrictions, prior to placing orders, in order to prevent the occurrence of breaches. When submitting orders an automated check of the investment guidelines restrictions is performed, generating a warning to the portfolio managers, highlighting potential breaches that would materialize in case the orders would be executed.

### Engagement policies

*Is engagement part of the environmental or social investment strategy?*

Yes  No

The Fixed Income Boutique considers direct engagement to be an important element of its investment activities. As an active manager, the Investment Manager generally prefers to engage with the management of investee companies directly, based on the belief that the direct contact between investee company management teams and investment professionals such as portfolio managers and analysts who have the specific expert knowledge and understanding of the context in which the company has been selected as an investment.

Reasons to engage with an investee company can include business strategy, corporate governance issues, change in the capital structure, remuneration issues, and identified environmental and social factors. Engagement includes ongoing communications between the investment team and the management teams of investee companies and can range from ongoing updates and questioning of the current and future business model, to engagement on specific issues that may cover ESG concerns.

Moreover, engagement helps the Investment Manager to mitigate data quality issues and problems arising from differences in reporting and corporate governance standards especially in high yield and emerging markets.

In addition to direct engagement activities, the Investment Manager also partners with a service provider, namely reo. The Investment Manager sees many advantages in working with a partner on voting and engagement. By pooling the assets in an engagement partner tool, the scale that is necessary to be present and visible towards management teams and boards in dialogues and engagement activities can be reached. This enables the Investment Manager to exert greater influence than our own investment volume would allow, and at the same time, to target a broader range of companies through the access to more resources. Finally, it facilitates Investment Manager's collaboration with other investors. The stewardship partner, namely reo, conducts engagement activities structured around three approaches:

- Bottom-up approach – the stewardship partner engages with companies that have exceptionally poor ESG practices or severe ESG controversies ("priority companies");
- Top-down approach – the stewardship partner selects companies for which practices should be improved based on thematic focus areas (e.g. climate risk management);
- Continuous risk management – the stewardship partner engages in response to controversies and breaches in global norms.

The Investment Manager has limited influence on the stewardship partner's engagement program.

### Designated reference benchmark

*Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?*

Yes  No

**Important information**

Subscriptions of shares of the fund should in any event be made solely on the basis of the fund's current sales prospectus (the "Sales Prospectus"), the Key (Investor) Information Document ("K(I)ID"), its articles of incorporation and the most recent annual and semi-annual report of the fund and after seeking the advice of an independent finance, legal, accounting and tax specialist. If you are in any doubt about the contents of this document or have any question, you should consult your professional and/or investment advisers.

The information in this document might have been revised either after the 1st of January 2023 (when the SFDR RTS came into effect) or following the launch of the financial product. The updates could have been made to offer more clarity on specific subjects or to align with any alterations in the financial product's ESG approach. You can locate the applicable date for this document at the top of the page and in the file name of this document.