

# Website Disclosure - SFDR

**Product name :** NN Ethenea Ethna-Aktive Fund  
**Categorisation:** article 8  
**Legal entity identifier (CODE LEI) :** 549300P1862TXM0YEB58  
**Version :** 21/02/2023

## a) Summary

The Ethna-AKTIV is an actively managed multi-asset fund. In addition to equities, investments are made primarily – but not exclusively – in corporate and sovereign bonds. ETCs (particularly gold) may be bought to a limited extent for the purpose of further diversification. Derivatives may also be used to manage liquidity and risk.

In terms of its bond and equity investments, the fund favours companies that already have a low exposure to material ESG issues or that actively manage, and thereby reduce, the ESG risks inevitably associated with their business activities.

In addition, the sustainability commitment of the Ethna-AKTIV is underpinned by comprehensive exclusions:

- Investments in companies whose core business is in the area of armaments, tobacco, pornography, food speculation and/or the mining/distribution of coal are prohibited.
- Furthermore, we do not invest in a company if serious infringements of the principles of the UN Global Compact have been identified and there is no convincing plan in place to remedy the situation.
- In the case of sovereign issuers, we exclude investments in bonds issued by countries that have been designated 'Not Free' in the annual analysis carried out by Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)).

To assess the ESG risks relating to individual companies and to evaluate the active management of these ESG risks within each company, we use the analyses provided by the external rating agency, Sustainalytics.

Sustainalytics summarises the results of their analyses in Sustainability-Related Disclosures an ESG Risk Rating ranging from 0 to 100, where a rating:

- below 10 indicates a negligible risk,
- from 10 to 19.99 indicates a low risk,
- from 20 to 29.99 indicates a medium risk,
- from 30 to 39.99 indicates a high risk, and
- of 40 or above indicates a severe risk.

Based on this ESG Risk Rating, the Ethna-AKTIV should on average attain a minimum of a medium ESG risk profile (i.e. an ESG Risk Rating of less than 30).

Individual securities with very severe risk (i.e. an ESG Risk Rating of greater than 50) will only be considered as an investment in the Ethna-AKTIV in well-founded, exceptional cases and shall be accompanied by an active engagement process to improve the ESG risk profile of the investment.

## **b) No sustainable investment objective**

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

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

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- In the case of sovereign issuers, we exclude investments in bonds issued by countries that have been designated 'Not Free' in the annual analysis carried out by Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)).

## **d) Investment strategy**

To assess the ESG risks relating to individual companies and to evaluate the active management of these ESG risks within each company, we use the analyses provided by the external rating agency, Sustainalytics.

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Individual securities with very severe risk (i.e. an ESG Risk Rating of greater than 50) will only be considered as an investment in the Ethna-AKTIV in well-founded, exceptional cases and shall be accompanied by an active engagement process to improve the ESG risk profile of the investment. Individual securities with very severe risk account for around 3% of the investment universe.

In addition, the product-related and normative exclusions listed in the previous point are taken into account within the framework of the investment strategy. These exclusions reduce the global investment universe by around 10%.

As part of the investment process, we also verify whether the companies in which we invest follow good governance practices. In this regard, our ESG policy provides several screening mechanisms, such as checking for controversies and compliance with the UN Global Compact. These in turn lead to

subsequent escalation levels ranging from various engagement options to strict exclusion of non-compliant companies (you will find a link to the ESG Policy at the end of this document).

### **e) Proportion of investments**

The Ethna-AKTIV is an actively managed multi-asset fund. In addition to equities, investments are made primarily – but not exclusively – in corporate and sovereign bonds. ETCs (particularly gold) may be bought to a limited extent for the purpose of further diversification. Derivatives may also be used to manage liquidity and risk. The concrete weighting of the individual asset classes depends on the market assessment of the Portfolio Managers and may be subject to fluctuations over time. The limit for equity investments set out in the prospectus is 49% of the fund's assets. For corporate bonds, a weighting of between 0% and 100% is possible, while up to 20% can be invested in commodities, of which a maximum of 10 % can be invested in a single commodity.

The aforementioned sustainability objectives of the fund, which consist of a comprehensive combination of environmental, social and governance aspects, can be implemented primarily in investments in equities and corporate bonds. Generally, these are well represented in the analyses provided by Sustainalytics, which cover more than 12,000 companies worldwide. In the event that less than 51% of the fund's company-related direct investments are covered by an ESG Risk Rating calculated by Sustainalytics, the Portfolio Managers must prepare their own analyses with comparable results or select alternative investments with an existing ESG Risk Rating.

Indirect investments in equities or corporate bonds, in particular through other investment funds or ETFs, are limited to a maximum of 10%.

Sovereign bonds are not directly affected by the sustainability goals outlined, but are subject to a strict social exclusion criterion (exclusion of countries designated 'Not Free').

Any ETCs or derivatives used are also not intended as active instruments for achieving the sustainability goals outlined.

Sustainable investments within the scope of Regulation (EU) 2019/2088 are not explicitly intended.

### **f) Monitoring of environmental or social characteristics**

The ESG Risk Ratings are monitored pre trade by the Portfolio Manager responsible for the fund and this is evaluated on a daily basis post trade by means of a specific ESG report. Exclusions are monitored both pre and post trade by an investment compliance system.

In addition, there are plans to publish a client report (ESG factsheet) accessible via the website, which contains the average ESG Risk Rating of the fund, as well as a distribution diagram of the ESG Risk Ratings of all direct investments in equities and corporate bonds held in the fund.

### **g) Methodologies**

ESG Risk Ratings from the external rating agency, Sustainalytics (a Morningstar subsidiary), enhance the decision-making process by providing an in-depth assessment of a company's exposure to sustainability-related factors, such as environmental, social and governance issues.

A company's ESG Risk Rating is ranked globally across the entire analysed universe of more than 12,000 companies. The rating takes a company's individual exposure to material ESG issues into

account and includes the company's active management of these risks in the final rating. Ratings of different sectors are therefore directly comparable with each other, so that at portfolio level there is an indication of the sustainability of the fund as a whole. Key influencing factors are: corporate governance, product governance, business ethics, access to basic services, human capital, bribery and corruption, emissions, effluents and waste, and occupational health and safety.

Comprehensive and clear explanations of the methodology used by Sustainalytics are available on their website [www.sustainalytics.com](http://www.sustainalytics.com).

#### **h) Data sources and processing**

The primary data source is the external rating provider, Sustainalytics. The requisite data is imported daily via an application programming interface (API) into the internal data collection of ETHENEA's Risk & Data Management Department, its quality is then checked in accordance with internal standards before the data is processed further.

Both the majority of the exclusions used and the ESG Risk Rating are based on data from Sustainalytics.

Once a year, the new country ratings from Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)) for the exclusion of sovereign issuers are manually added to the internal data collection.

Estimated data is not used.

#### **i) Limitations to methodologies and data**

So far, smaller companies rarely report on ESG-related risks and the measures taken in response, so the data situation there is more difficult and there is a risk that smaller companies will receive a weaker ESG rating from Sustainalytics or that no ESG rating will be available.

However, in practice this does not restrict the fund as it primarily invests in large-cap blue chips.

#### **j) Due diligence**

The ESG Risk Ratings are monitored pre trade by the Portfolio Manager responsible for the fund and this is evaluated on a daily basis post trade by means of a specific ESG report. Exclusions are monitored both pre and post trade by an investment compliance system.

#### **k) Engagement policies**

Engagement is not an integral part of achieving the environmental or social objectives of the investment strategy outlined in this document.

Only in well-founded exceptional cases, when Individual securities with severe risks (i.e. an ESG Risk Rating of greater than 50) are to be included in the portfolio, will this be accompanied by an active engagement process to improve the ESG risk profile of the investment.

Furthermore, engagement plays a role in the broader context of the wider sustainability strategy pursued by the Ethna-AKTIV. For further information, please refer to our website [www.ethenea.com](http://www.ethenea.com), in particular the Guidelines for Sustainable Investments (ESG) and the separate Guideline for Exercising Voting Rights.

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### **I) Designated reference benchmark**

No reference benchmark is used.

Sustainability information contained in this product document has been compiled by NN Insurance Belgium SA/NV to the best of its ability. However, NN is dependent on the information on the various sustainability aspects made available by the asset managers. However, the legislation requiring this information to be made available only came into force on 1 January 2023. The information in this document has therefore been compiled on the basis of the information made available to date and may be modified and/or supplemented in line with the information that will be provided by asset managers in the coming years.