

# NN Strategy Non Fiscal

## NN Scala Invest

### Document précontractuel de durabilité

Informations précontractuelles relatives aux produits financiers visées à l'article 8, paragraphes 1, 2 et 2 bis, du règlement (UE) 2019/2088 et à l'article 6, premier alinéa, du règlement (UE) 2020/852, et conformément à l'article 20 du règlement délégué (UE) 2022/1288

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Les informations sur la durabilité contenues dans ce document de produit précontractuel ont été préparées au mieux par NN Insurance Belgium SA/NV sur la base des informations actuellement disponibles pour les gestionnaires d'actifs. Toutefois, la réglementation imposant à ces gestionnaires de fortune de mettre ces informations à disposition n'est entrée en vigueur que le 1er janvier 2023. Les informations contenues dans ce document peuvent être modifiées et/ou complétées en fonction des informations que les gestionnaires d'actifs fourniront dans les mois à venir.

## 1. Transparence des politiques de risque en matière de durabilité

Conformément à l'Article 3 du Sustainable Finance Disclosure Regulation (« **SFDR** »), NN Insurance Belgium (« **NN IB** ») est tenue de divulguer ses politiques en matière d'intégration des risques de durabilité dans son processus décisionnel en matière d'investissement. Le SFDR définit le risque de durabilité comme un événement ou une condition environnementale, sociale ou de gouvernance qui, s'il se produit, pourrait avoir un impact négatif important réel ou potentiel sur la valeur de l'investissement. Ces divulgations sont énumérées ci-dessous.

### **Facteurs et risques environnementaux, sociaux et de gouvernance (ESG)**

NN IB considère les risques de développement durable comme des risques liés à des facteurs environnementaux, sociaux et de gouvernance (« facteurs **ESG** ») qui peuvent avoir un impact négatif significatif sur la performance, la réputation, la valeur, le bilan ou les opérations à long terme de NN Group.

En ce qui concerne le SFDR, cela inclut les facteurs ESG qui peuvent avoir un impact négatif significatif sur la valeur des investissements dans les produits financiers des clients de NN IB. Voici des exemples de facteurs environnementaux, sociaux et de gouvernance (ESG) :

- **Facteurs environnementaux** : changement climatique, autres formes de dégradation de l'environnement (par exemple, pollution de l'air, pollution de l'eau, pénurie d'eau douce, contamination des terres, perte de biodiversité et déforestation) et bien-être animal, en plus des mesures correctives visant à remédier à ces facteurs. Le changement climatique est divisé en
  - a) les effets transitoires résultant de la transition vers une économie verte et à faible intensité de carbone ;
  - b) les effets physiques résultant de changements dans les conditions météorologiques, la température, les conditions hydrologiques ou les écosystèmes naturels (changements aigus ou à plus long terme).
- **Facteurs sociaux** : droits, bien-être et intérêts des personnes et des communautés, y compris les droits de la personne, l'(in)égalité, la santé, l'inclusion, la diversité, les droits des employés et les relations de travail, la santé et la sécurité au travail.
- **Facteurs de gouvernance** : poursuivre ou appliquer des pratiques de gouvernance appropriées, notamment en ce qui concerne la direction, la rémunération des dirigeants, les audits, les contrôles internes, l'évasion fiscale, l'indépendance du conseil d'administration, les droits des actionnaires, la lutte contre la corruption et les pots de vin, ainsi que la manière dont les entreprises ou entités incluent les facteurs environnementaux et sociaux dans leurs politiques et procédures.

### **Taxonomie des Risques NN**

NN IB a défini et catégorisé son paysage générique des risques inhérents dans une Taxonomie des Risques. NN IB considère les risques de durabilité comme des risques transversaux. Cela signifie que nous considérons que les risques de durabilité se manifestent par des types de risques reconnus dans la Taxonomie des Risques. Les risques identifiés dans la Taxonomie des Risques se rapportent à divers domaines de risque, tels que les risques émergents, les risques stratégiques, les risques financiers et les risques non financiers. Ceux-ci couvrent les opérations et les produits propres de NN IB, mais aussi les investissements réalisés. Dans le cadre de la Taxonomie des Risques, les facteurs ESG ont été mis en correspondance avec les catégories de risque liées à l'investissement. Ces facteurs ESG sont considérés comme des facteurs de risque, ce qui signifie que nous pensons qu'ils peuvent influencer les niveaux de risque des différentes catégories de risque d'investissement identifiées. Des exemples de ces catégories de risque sont le risque d'actif.

## Application dans la prise de décision d'investissement

NN IB prend en compte les risques de durabilité dans le processus de prise de décision d'investissement de différentes manières. La façon exacte dont cela est fait n'est pas statique, car notre approche évolue au fil du temps en fonction des informations obtenues, des pratiques des marchés émergents, de la disponibilité de données et d'outils pertinents et robustes et des développements réglementaires. En outre, la manière dont les risques en matière de durabilité peuvent être pris en compte dépend également de l'investissement ou de la proposition de produit spécifique – il peut donc y avoir des différences entre l'approche générale et l'approche appliquée à des propositions d'investissement ou de produit spécifiques. Les principaux domaines dans lesquels NN IB prend en compte les risques de durabilité dans le processus décisionnel d'investissement sont les suivants.

#	Aire	Description
1	Application par NN IB de la <i>Responsible Investment Framework policy</i> de NN Group («RI Framework policy») au niveau du gestionnaire et de la sélection des fonds et au niveau du portefeuille	<p>NN Group dispose d'une vaste politique de cadre d'investissement responsable, qui couvre un éventail de sujets tels que l'actionnariat actif (engagement et vote), les restrictions et l'intégration systématique des risques et opportunités importants en matière de durabilité dans la recherche et l'analyse des investissements. Nous croyons que grâce à l'application de ces exigences et méthodes, les risques de durabilité sont directement ou indirectement réduits pour les investissements que nous faisons. Bien que les restrictions soient souvent fondées sur nos valeurs et nos normes sociétales, elles contribuent également à réduire les risques liés aux actifs – par exemple, les restrictions sur les investissements dans les entreprises impliquées dans le charbon thermique devraient réduire le risque que ces investissements deviennent des actifs échoués. Veuillez consulter <a href="https://www.nn-group.com/sustainability/responsible-investment/responsible-investment-policy-framework.htm">https://www.nn-group.com/sustainability/responsible-investment/responsible-investment-policy-framework.htm</a> pour plus d'informations sur la Responsible Investment Framework policy de NN Group.</p> <p>Comme NN IB investit par l'intermédiaire de gestionnaires externes, nous tenons compte des critères ESG dans le processus de sélection des gestionnaires d'actifs externes. Ces gestionnaires d'actifs gèrent leurs fonds selon leur propre stratégie et NN IB décide d'investir ou non dans ceux-ci.</p> <p>Ces critères sont inclus dans le processus de diligence raisonnable et de sélection, de suivi et d'évaluation du gestionnaire, dans lequel NN IB examine si le gestionnaire a mis en place des processus structurels et des méthodologies appropriés en relation avec les domaines clés de la politique du cadre d'investissement responsable de NN Group, y compris les risques de durabilité.</p>
2	Processus d'approbation et d'examen des produits (« PAR »)	Dans le cadre du processus d'approbation et d'examen des produits (PAR), NN IB analyse et documente la manière dont les risques de durabilité peuvent avoir un impact sur les passifs (appelés <i>réclamations</i> ) d'un produit spécifique, dans lequel la durée des passifs est également prise en compte.
3	Évaluations des risques	NN IB effectue régulièrement des évaluations des risques. Une évaluation qualitative des risques liés à la durabilité est effectuée afin d'identifier les risques et, le cas échéant, de déterminer les mesures d'atténuation des risques.

## 2. Classification des fonds (options d'investissement)

NN Strategy-Non-fiscal/Scala Invest se compose de 40 fonds d'investissement sous-jacents, dont certains promeuvent des caractéristiques écologiques et/ou sociales ou poursuivent un objectif d'investissement durable. Le fonds interne investit à 100% dans le fonds d'investissement sous-jacent. L'objectif et la politique d'investissement du fonds interne sont 100% conformes à l'objectif et à la politique d'investissement du fonds d'investissement sous-jacent.

Sur la base des informations fournies par le gestionnaire d'actifs des fonds d'investissement sous-jacents, ces fonds d'investissement sous-jacents ont été classés au titre de l'article 6, 8 ou 9 du SFDR.<sup>123</sup>

31 des fonds ( 77,50 % du nombre total de fonds) sont classés au titre de l'article 8 du SFDR, 6 fonds (15% du nombre total de fonds) sont classés au titre de l'article 9 du SFDR et 3 fonds ( 7,50 % du nombre total de fonds) sont classés au titre de l'article 6 du SFDR.

Pour les fonds relevant des articles 8 et 9, de plus amples informations sur les caractéristiques durables sont disponibles sur la page produit de notre site web:

- **NN Strategy non-fiscal** : <https://www.nn.be/fr/prive/investissements/nn-strategy-investissement-libre-dans-la-branche-23-non-fiscal>
- **NN Scala Invest** : <https://www.nn.be/fr/product/scala-invest-investissement-libre-dans-la-branche-23>

sous « Documents importants ».

Les informations relatives à la prise en compte des principaux effets négatifs des décisions d'investissement sur les facteurs de durabilité inclus par les fonds d'investissement sous-jacents sont disponibles dans les informations précontractuelles relatives à chacune de ces options d'investissement. Toutefois, lors du choix des options d'investissement pour ce produit, la prise en compte de ces principaux effets négatifs n'a pas été déterminante.

## 3. Classification du produit

NN Insurance Belgium SA a classé ce produit au titre de l'article 8 SFDR car il favorise les caractéristiques écologiques et/ou sociales. Pour que le produit puisse être classé au titre de l'article 8 SFDR pour le preneur d'assurance, le produit financier doit être investi dans au moins une des options d'investissement classées aux articles 8 ou 9 de la liste ci-dessous et au moins une de ces options de placement doit être détenue pendant la période pendant laquelle le produit est détenu.

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<sup>1</sup> Article 6 SFDR: le fonds ne promeut pas les caractéristiques écologiques et/ou sociales et ne poursuit pas d'objectifs d'investissement durable.

<sup>2</sup> Article 8 SFDR: le fonds promeut les caractéristiques écologiques et/ou sociales.

<sup>3</sup> Article 9 SFDR: le fonds poursuit un objectif d'investissement durable.

Liste des fonds d'investissement:

Nom du fonds interne	Nom du gestionnaire d'actifs	Nom du fonds d'investissement sous-jacent	Code ISIN	Classification SFDR
NN BlackRock BGF Global Allocation Fund A2 Fund	BlackRock	BGF Global Allocation Fund A2 EUR (CAP)	LU0171283459	6 (2)
NN Capital Group Global Allocation Fund	Capital Group	Capital Group Global Allocation Fund (LUX) B EUR	LU1006075656	6 (3)
NN Carmignac Emergents Fund	Carmignac Gestion	Carmignac Emergents A EUR Acc	FR0010149302	9
NN Carmignac Patrimoine Fund	Carmignac Gestion	Carmignac Patrimoine A EUR Acc	FR0010135103	8
NN DNCA Invest Eurose Fund	DNCA Investments	DNCA Invest Eurose	LU0284394235	8
NN Ethenea Ethna-AKTIV Fund	ETHENEA Independent Investors S.A.	Ethna-AKTIV -T-	LU0431139764	8
NN FFG European Equities Sustainable Moderate Fund	Funds For Good	FFG European Equities Sustainable Moderate	LU0945616984	8
NN FFG Global Flexible Sustainable Fund	Funds For Good	FFG Global Flexible Sustainable	LU1697917083	8
NN Fidelity America Fund	Fidelity International	Fidelity Funds - America Fund	LU0251127410	8
NN Fidelity Pacific Fund	Fidelity International	Fidelity Funds - Pacific Fund	LU0368678339	8
NN Fidelity World Fund	Fidelity International	Fidelity Funds - World Fund	LU1261432659	8
NN Flossbach von Storch - Bond Opportunities Fund	Flossbach von Storch	Flossbach von Storch - Bond Opportunities - RT	LU1481583711	8
NN Flossbach von Storch Multiple Opportunities II RT Fund	Flossbach von Storch	Flossbach von Storch Multiple Opportunities II RT	LU1038809395	8
NN GS Emerging Markets Debt Fund	Goldman Sachs Asset Management	Goldman Sachs Emerging Markets Debt (Hard Currency)	LU0546915058	8
NN GS Euro Bond Fund	Goldman Sachs Asset Management	Goldman Sachs Euro Bond	LU0546917773	8
NN GS Europe Sustainable Equity Fund	Goldman Sachs Asset Management	Goldman Sachs Europe Sustainable Equity	LU0991964320	8
NN GS Eurozone Equity Income Fund	Goldman Sachs Asset Management	Goldman Sachs Eurozone Equity Income	LU0127786431	8
NN GS Global Social Impact Equity Fund	Goldman Sachs Asset Management	Goldman Sachs Global Social Impact Equity	LU0332192961	9
NN GS Global Sustainable Equity Fund	Goldman Sachs Asset Management	Goldman Sachs Global Sustainable Equity	LU0119216553	8
NN GS Multi Asset Factor Opportunities Fund	Goldman Sachs Asset Management	Goldman Sachs Multi Asset Factor Opportunities	LU2055071596	6 (1)
NN GS Patrimonial Aggressive Fund	Goldman Sachs Asset Management	Goldman Sachs Patrimonial Aggressive	LU0119195450	8
NN GS Patrimonial Balanced Europe Sustainable Fund	Goldman Sachs Asset Management	Goldman Sachs Patrimonial Balanced Europe Sustainable	LU1444115874	8
NN GS Patrimonial Balanced Fund	Goldman Sachs Asset Management	Goldman Sachs Patrimonial Balanced	LU0119195963	8
NN GS Patrimonial Defensive Fund	Goldman Sachs Asset Management	Goldman Sachs Patrimonial Defensive	LU0119196938	8
NN JP Morgan Euro Liquidity Fund	JPMorgan Asset Management	JPMorgan Liquidity Funds - EUR Standard Money Market VNAV Fund	LU2095450479	8
NN JPM US Technology Fund	JPMorgan Asset Management	JPM US Technology Fund	LU0159052710	8
NN Lazard Patrimoine Opportunities SRI Fund	Lazard Frères Gestion	Lazard Patrimoine Opportunities SRI RC EUR	FR0007028543	8
NN M&G Dynamic Allocation Fund	M&G Investments	M&G (Lux) Dynamic Allocation Fund	LU1582988058	8
NN M&G Global Listed Infrastructure Fund	M&G Investments	M&G (Lux) Global Listed Infrastructure Fund	LU1665237704	8
NN M&G Optimal Income Fund	M&G Investments	M&G (Lux) Optimal Income Fund	LU1670724373	8
NN Nordea Global Climate and Environment Fund	Nordea Asset Management	Nordea Global Climate and Environment Fund	LU0348926287	9
NN Nordea Global Real Estate Fund	Nordea Asset Management	Nordea Global Real Estate Fund	LU0705259769	8
NN Pictet-Global Megatrend Selection Fund	Pictet Asset Management	Pictet-Global Megatrend Selection	LU0386882277	8
NN R-co Valor Balanced Fund	Rothschild & Co Asset Management Europe	R-co Valor Balanced	FR0013367281	8
NN R-co Valor Fund	Rothschild & Co Asset Management Europe	R-co Valor	FR0011261197	8
NN Schroder ISF Global Energy Transition Fund	Schroders	Schroder ISF Global Energy Transition	LU2390151400	9

NN Threadneedle Global Focus Fund	Columbia Threadneedle Investments	Threadneedle (Lux) Global Focus	LU0757431068	8
NN Threadneedle Global Smaller Companies Fund	Columbia Threadneedle Investments	Threadneedle (Lux) Global Smaller Companies	LU0570870567	8
NN Triodos Euro Bond Impact Fund	Triodos Investment Management	Triodos Euro Bond Impact Fund	LU0278272504	9
NN Triodos Global Equities Impact Fund	Triodos Investment Management	Triodos Global Equities Impact Fund	LU0278271951	9

Le règlement européen SFDR ne prévoit pas d'annexe spécifique pour les fonds relevant de l'article 6. Le cas échéant, une information sur les principales incidences négatives (PAI) sur les facteurs de durabilité est fournie via un lien ci-dessous.

(1) <https://www.gsam.com/responsible-investing/fr-BE/non-professional/about/declaration-sur-les-principales-incidences-negatives-en-matiere-de-durabilite>

(2) <https://www.blackrock.com/corporate/literature/continuous-disclosure-and-important-information/sfdr-principal-adverse-sustainability-impact-statement.pdf>

(3) [https://www.capitalgroup.com/content/dam/cgc/tenants/eacg/esg/files/annex\(fr\).pdf](https://www.capitalgroup.com/content/dam/cgc/tenants/eacg/esg/files/annex(fr).pdf)

## Product name: JPMorgan Liquidity Funds - EUR Standard Money Market VNAV Fund

Legal entity identifier: 5493003UE5TIZ70I5C71

### Environmental and/or social characteristics

**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.

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

<input checked="" type="radio"/> <input checked="" type="radio"/> Yes	<input checked="" type="radio"/> <input type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __%  <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy  <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> __%	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>10.00%</b> of sustainable investments  <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  <input checked="" type="checkbox"/> with a social objective  <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



### What environmental and/or social characteristics are promoted by this financial product?

The Sub-Fund promotes a broad range of environmental and social characteristics through its inclusion criteria for investments that promote environmental and/or social characteristics. It is required to invest at least 51% of its assets in such securities. It also promotes certain norms and values by excluding particular issuers from the portfolio.

Through its inclusion criteria, the Sub-Fund promotes environmental characteristics which may include effective management of toxic emissions and waste as well as good environmental record. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues. In addition, the Sub-Fund incorporates a bespoke set of Employee Engagement and Diversity (EE&D) data inputs into the investment process which considers an issuers gender breakdown, diversity programmes, ethnicity score and equal pay score. The inputs may evolve but will relate directly to EE&D. The Sub-Fund invests at least 51% of EE&D rated assets in issuers scoring above a pre-defined threshold in relation to EE&D inputs as explained further in the question below.

Through its exclusion criteria, the Sub-Fund promotes certain norms and values such as support for the protection of internationally proclaimed human rights and reducing toxic emissions, by fully excluding issuers that are involved in particular activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco. Please refer to the exclusions policy for the Sub-Fund on [www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu) for further information by searching for your particular Sub-Fund and accessing the ESG Information section.

No benchmark has been designated for the purpose of attaining the environmental or social characteristics.

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

A combination of the Investment Manager's proprietary ESG scoring methodology and/or third party data are used as indicators to measure the attainment of the environmental and/ or social characteristics that the Sub-Fund promotes.

To be included in the 51% of assets promoting environmental and/or social characteristics, an issuer must score in the top 80% relative to the investment universe on either its environmental score or social score and follow good governance practices.

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

To be included in the 51% of good EE&D assets, an issuer must have an EE&D rating applied by the Investment Manager based on the relevant inputs and score in the top 80% relative to the universe of such rated assets.

To promote certain norms and values, the Investment Manager utilizes data to measure a company's participation in activities potentially contrary to the Sub-Fund's exclusion policy as referenced in the answer to the question directly above such as issuers manufacturing controversial weapons. The data may be obtained from investee issuers themselves and/or supplied by third party service providers (including proxy data). Data inputs that are self-reported by issuers or supplied by third-party providers may be based on data sets and assumptions that may be insufficient, of poor quality or contain biased information. Third party data providers are subject to rigorous vendor selection criteria which may include analysis on data sources, coverage, timeliness, reliability and overall quality of the information, however, the Investment Manager cannot guarantee the accuracy or completeness of such data.

Screening on that data results in full exclusions on certain potential investments and partial exclusions based on maximum percentage thresholds on revenue, production or distribution on others. A subset of the "Adverse Sustainability Indicators" as set out in the EU SFDR Regulatory Technical Standards is also incorporated in the screening and the relevant metrics are used to identify and screen out identified violators.

● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objectives of the Sustainable Investments that the Sub-Fund partially intends to make may include any individual or combination of the following or be linked to an environmental or social objective through the use of proceeds of the issue: Environmental Objectives (i) climate risk mitigation, (ii) transition to a circular economy; Social Objectives (i) inclusive and sustainable communities - increased female executive representation, (ii) inclusive and sustainable communities - increased female representation on boards of directors and (iii) providing a decent working environment and culture.

Contribution to such objectives is determined by either (i) products and services sustainability indicators, which may include the percentage of revenue derived from providing products and / or services that contribute to the relevant sustainable objective, such as company producing solar panels or clean energy technology that meets the Investment Manager's proprietary thresholds contributing to climate risk mitigation. The current percentage of revenue is set at a minimum of 20% and the entire holding in the issuer is considered a Sustainable Investment; (ii) the use of proceeds of the issue, if such use is designated as linked to a specific environmental or social objective, or (iii) being an operational peer group leader contributing to the

relevant objective. Being a peer group leader is defined as scoring in the top 20% relative to the Sub-Fund's investment universe based on certain operational sustainability indicators. For example, scoring in the top 20% relative to the investment universe on total waste impact contributes to a transition to a circular economy. The test for supranational and sovereign issuers may consider the issuer's mission or contributions, as peer group leaders or improvers, to positive environmental and social objectives subject to certain criteria.

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

The Sustainable Investments that the Sub-Fund partially intends to make are subject to a screening process that seeks to identify and exclude, from qualifying as a Sustainable Investment, those issuers which the Investment Manager considers the worst offending, based on a threshold determined by the Investment Manager, in relation to certain environmental considerations. Such considerations include climate change, protection of water and marine resources, transition to a circular economy, pollution and protection of biodiversity and ecosystems. The Investment Manager also applies a screen that seeks to identify and exclude those issuers that the Investment Manager considers to be in violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights based on data supplied by third party service providers

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The indicators for adverse impacts on sustainability factors in Table 1 of Annex 1 and certain indicators, as determined by the Investment Manager, in Tables 2 and 3 of Annex 1 of the EU SFDR Regulatory Technical Standards have been taken into account as further described below. The Investment Manager either uses the metrics in the EU SFDR Regulatory Technical Standards, or where this is not possible due to data limitations or other technical issues, it uses a representative proxy. The Investment Manager consolidates the consideration of certain indicators into a "primary" indicator as set out further below and it may use a broader set of indicators than referenced below.

The relevant indicators in Table 1 of Annex 1 of the EU SFDR Regulatory Technical Standards consist of 9 environmental and 5 social and employee related indicators. The environmental indicators are listed at 1-9 and relate to green-house gas emissions (1-3), exposure to fossil fuel, share of non-renewable energy consumption and production, energy consumption intensity, activities negatively affecting biodiversity sensitive areas, emissions to water and hazardous waste (4-9 respectively).

Indicators 10 - 14 relate to an issuers social and employee matters and cover violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises, lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles, unadjusted gender pay gap, Board gender diversity and exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) respectively.

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, anti-corruption and anti-bribery matters.



The Investment Manager also takes into account PAI 16 in relation to Investee countries subject to social violations. The Investment Manager's approach includes quantitative and qualitative aspects to take the indicators into account. It uses particular indicators for screening, seeking to exclude issuers that may cause significant harm. It uses a subset for engagement seeking to influence best practice and it uses certain of them as indicators of positive sustainability performance, by applying a minimum threshold in respect of the indicator to qualify as a Sustainable Investment.

The data needed to take the indicators into account, where available, may be obtained from investee issuers themselves and/or supplied by third party service providers (including proxy data). Data inputs that are self-reported by issuers or supplied by third-party providers may be based on data sets and assumptions that may be insufficient, of poor quality or contain biased information. The Investment Manager cannot guarantee the accuracy or completeness of such data.

#### Screening

Certain of the indicators are taken into account through the values and norms-based screening to implement exclusions.

These exclusions take into account indicators 10, 14 and 16 in relation to UN Global Compact principles and OECD Guidelines for Multinational Enterprises, controversial weapons and investee countries subject to social violations.

The Investment Manager also applies a purpose built screen. Due to certain technical considerations, such as data coverage in respect of specific indicators, the Investment Manager either applies the specific indicator per Table 1 or a representative proxy, as determined by the Investment Manager to screen investee issuers in respect of the relevant environmental or social & employee matters. For example, greenhouse gas emissions are associated with several indicators and corresponding metrics in Table 1, such as greenhouse gas emissions, carbon footprint and greenhouse gas intensity (indicators 1-3). The Investment Manager currently uses greenhouse gas intensity data (indicator 3), data in respect of non-renewable energy consumption and production (indicator 5) and data on energy consumption intensity (indicator 6) to perform its screening in respect of greenhouse gas emissions.

In connection with the purpose built screening and in respect of activities negatively affecting biodiversity sensitive areas and the emissions to water (indicators 7 and 8), due to data limitations, the Investment Manager uses a third-party representative proxy rather than the specific indicators per Table 1. The Investment Manager also takes into account indicator 9 in relation to hazardous waste in respect of the purpose built screen.

#### Engagement

In addition to screening out certain issuers as described above, the Investment Manager engages on an ongoing basis with selected underlying investee issuers. A subset of the indicators will be used, subject to certain technical considerations such as data coverage, as the basis for engaging with selected underlying investee issuers in accordance with the approach taken by the Investment Manager on stewardship and engagement. The indicators currently used in respect of such engagement include indicators 3, 5 and 13 in relation to greenhouse gas intensity, share of non-renewable energy and board gender diversity from Table 1. It also uses indicators 2 in Table 2 and 3 in Table 3 in relation to emission of air pollutants and number of days lost to injuries, accidents, fatalities or illness.

#### Indicators of sustainability

The Investment Manager uses indicators 3 and 13 in relation to GHG Intensity and board gender diversity as indicators of sustainability to assist in qualifying an investment as a Sustainable Investment. One of the pathways requires an issuer to be considered as an operational peer group leader to qualify as a Sustainable Investment. This requires scoring against the indicator in the top 20% relative to the Sub-Funds investment universe.

### ● ***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 norms based exclusions as described above under "What environmental and/or social characteristics are promoted by this financial product?" seek alignment with these guidelines and principles. Third party data is used to identify violators and prohibit relevant investments in these issuers.

*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 not 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.*



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

☒ Yes, The Sub-Fund considers select principal adverse impacts on sustainability factors through values and norms-based screening to implement exclusions. Indicators 10, 14 and 16 in relation to violations of the UN Global Compact, controversial weapons and country level social violations from the EU SFDR Regulatory Technical Standards are used in respect of such screening.

The Sub-Fund also uses certain of the indicators as part of the “Do No Significant Harm” screen as detailed in the response to the question directly above to demonstrate that an investment qualifies as a Sustainable Investment.

Further information can be found in future annual reports in respect of the Sub-Fund and by searching for “Approach to EU MiFID Sustainability Preferences” on [www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu)

☐ No



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The Sub-Fund's strategy can be considered in respect of its general investment approach and ESG approach as follows:

Investment approach

- Seeks opportunities across all cash segments.
- Qualifies as a Standard VNAV MMF.

ESG approach: ESG Promote

- Excludes certain sectors, companies / issuers or practices based on specific values or norms based criteria.
- At least 51% of assets to be invested in positive ESG issuers / companies and at least 51% of EE&D rated assets invested in good EE&D issuers.
- At least 10% of assets to be invested in Sustainable Investments.
- All issuers / companies follow good governance practices.

### ● What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics are:

- The requirement to invest at least 51% of assets in issuers with positive environmental and/or social characteristics and 51% of EE&D rated assets in good EE&D issuers.
- The values and norms based screening to implement full exclusions in relation to issuers that are involved in certain activities such as manufacturing controversial weapons and applying maximum revenue, production or distribution percentage thresholds to others such as those that are involved in thermal coal and tobacco. Please refer to the exclusions policy for the Sub-Fund on [www.jpmorganassetmanagement.lu](http://www.jpmorganassetmanagement.lu) for further information by searching for your particular Sub-Fund and accessing the ESG Information section.
- The requirement for all issuers in the portfolio to follow good governance practices.

The Sub-Fund also commits to investing at least 10% of assets in Sustainable Investments.

### ● What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The Sub-Fund does not apply such a committed minimum rate.

### ● What is the policy to assess good governance practices of the investee companies?

Investments (excluding derivatives) are screened to exclude known violators of good governance practices. In addition, for those investments included in the 51% of assets promoting environmental and/or social characteristics or qualifying Sustainable Investments, additional considerations apply. For these investments, the Sub-Fund incorporates a peer group comparison and screens out issuers that do not score in the top 80% relative to the Sub-Fund's investment universe based on good governance indicators.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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

**Asset allocation** describes the share of investments in specific assets.

The Sub-Fund plans to allocate at least 51% of assets to issuers with positive environmental and/or social characteristics and a minimum of 51% of EE&D rated assets in good EE&D issuers. The Sub-Fund will also allocate at least 10% of assets to Sustainable Investments. The Sub-Fund does not commit to investing any proportion of assets specifically in issuers exhibiting positive environmental characteristics or specifically in positive social characteristics nor is there any commitment to any specific individual or

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.

combination of environmental or social objectives in respect of the Sustainable Investments. Therefore, there are no specific minimum allocations to environmental or social objectives referred to in the diagram below.

Ancillary liquid assets (for managing cash subscriptions and redemptions as well as current and exceptional payments) and derivatives for hedging are not included in the % of assets set out in the table below. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.



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

## ● How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Derivatives are not used to attain the environmental or social characteristics promoted by the Sub-Fund.



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

The Sub-Fund invests at least 10% of assets in Sustainable Investments, however, 0% of assets are committed to Sustainable Investments with an environmental objective aligned with the EU Taxonomy.

### ● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

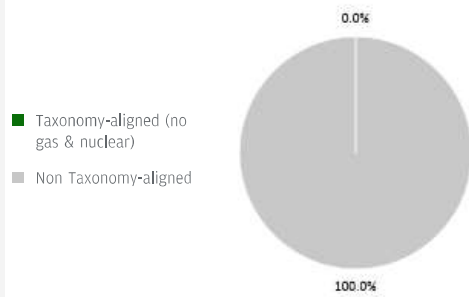
Not applicable

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

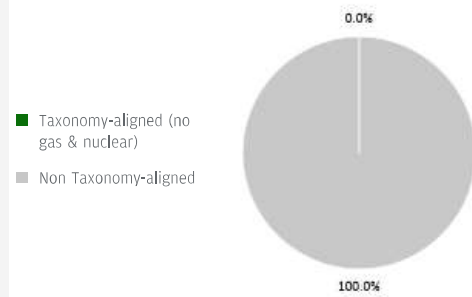
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in blue the minimum percentage of investments that are 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\*



This graph represents 100% of the total investments

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

#### 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.

### What is the minimum share of investments in transitional and enabling activities?

The Sub-Fund invests at least 10% of assets in Sustainable Investments, however, 0% of assets are committed to Sustainable Investments with an environmental objective aligned with the EU Taxonomy. Accordingly, 0% of assets are committed to transitional and enabling activities.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund invests at least 10% of assets in Sustainable Investments, typically across both environmental and social objectives. It does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

The Sub-Fund invests at least 10% of assets in Sustainable Investments, typically across both environmental and social objectives. However, it does not commit to any specific individual or combination of Sustainable Investment objectives and therefore there is no committed minimum share.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The “other” investments are comprised of issuers that did not meet the criteria described in response to above question entitled, “What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?” to qualify as exhibiting positive environmental or social characteristics. They are investments for diversification purposes.

Ancillary liquid assets (for managing cash subscriptions and redemptions as well as current and exceptional payments) are not included in the % of assets set out in the diagram above. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.

All investments, including “other” investments are subject to the following ESG Minimum Safeguards/principle:

- The minimum safeguards as outlined by Article 18 of the EU Taxonomy Regulation (including alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights).
- Application of good governance practices (these include sound management structures, employee relations, remuneration of staff and tax compliance).
- Compliance with the Do No Significant Harm principle as prescribed under the definition of Sustainable Investment in EU SFDR.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**  
Not applicable
- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**  
Not applicable
- **How does the designated index differ from a relevant broad market index?**  
Not applicable
- **Where can the methodology used for the calculation of the designated index be found?**  
Not applicable



## Where can I find more product specific information online?

More product-specific information can be found on the website: [www.ipmorganassetmanagement.lu](http://www.ipmorganassetmanagement.lu) by searching for your particular Sub-Fund and accessing the ESG Information section.