

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 https://www.nn-group.com/sustainability/responsible-investment/responsible-investment-policy-framework.htm 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.¹²³

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.

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

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

³ 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)

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

Product name: DNCA INVEST - EUROSE

Legal entity identifier: 2138006QOV1H1QGA5J08

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective:** ____%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of **sustainable investments with a social objective:** ____%



It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but **will not make any sustainable investments**



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

The characteristics promoted by the Sub-Fund are governance, environment, social and societal criteria.

The management of the Sub-Fund relies on the proprietary analysis tool on environment, social and governance: ABA (Above and Beyond Analysis).

As part of the promotion of such characteristics, the Sub-Fund will in particular consider the following ESG matters for private issuers:

- Environnement: GHG emissions, airborne pollution, waterborne pollution, water consumption, land use, etc.

- Social: Excessive CEO Compensation, gender inequality, health and safety issues, child labor, etc.
- Governance: Monitoring corruption and bribery, tax avoidance, etc.
- Global ESG quality rating.

In this way, for private issuers, the investment process and resulting stock and bond picking take into account internal scoring with respect to both corporate responsibility and sustainability of companies based on an extra-financial analysis through a proprietary tool developed internally by the Management Company, with the "best in universe" method. There may be a sector bias.

As part of the promotion of such characteristics, the Sub-Fund will in particular consider the following ESG matters for public issuers:

- Environment: carbon intensity and consumption energy mix breakdown.
- Social: respect of international standards (child labor, discrimination, freedom of association, money laundering, labor rights, human rights, freedom of press and torture.
- Governance: Accord de Paris signatory, UN-Biodiversity convention signatory, coal, exit policy, nuclear weapon non-proliferation agreement.
- Global ESG risk rating and coverage.

For public issuers, the investment process and resulting picking take into account internal scoring with respect to responsibility of public issuers such as country based on an extra-financial analysis through a proprietary tool developed internally by the Management Company, with a minimum rating approach method.

The Sub-Fund does not use a benchmark for the purpose of attaining the ESG Characteristics promoted by the Sub-Fund.

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

The sustainability indicators used by the Sub-Fund are for private issuers:

- The "Above and Beyond Analysis" ("ABA", the proprietary tool) Corporate Responsibility Score: the main sustainability indicator used by the Sub-Fund is the ABA scoring (see part "Investment Strategy") based on the Corporate Responsibility and divided into four pillars: shareholder responsibility, environmental responsibility, employer responsibility, societal responsibility.
- The Transition to a Sustainable Economy Score: the Management Company complete this analysis by an assessment of companies' exposure to "Transition to a Sustainable Economy". This score is based on five pillars: demographic transition, healthcare transition, economic transition, lifestyle transition and ecologic transition

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

- Exposure to UN Sustainable Development Goals: the Management Company assesses for each company the part of revenues linked to one of the 17 Sustainable Development Goals of United Nations.
- Carbon data: carbon footprint (t CO₂/m\$ invested) of the Sub-Fund's portfolio.
- Carbon intensity (t CO₂/m\$ revenues) of the Sub-Funds' portfolio.

For public issuers, the sustainability indicators used are the following:

- The "Above and Beyond Analysis" ("ABA", the proprietary tool): a dedicated model to rate public issuers based on four pillars: governance, environment, social and society.
- The Climate Profile: the Management Company complete this analysis by an assessment of issuers' Climate Profile based on energy mix and evolution, carbon intensity and resources stock.
- Carbon data: carbon footprint (t CO₂/m\$ debt) of the Sub-Fund's portfolio.
- Carbon intensity (t CO₂/m\$ GDP) of the Sub-Funds' portfolio.
- The proportion of the Sub-Fund's portfolio in the controversial issuers based on several criteria such as: respect of freedom, child labor, human rights, torture practices, money laundering, etc.

● ***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 of the Sub-Fund are the contributions of the investee companies to the United Nations Sustainable Development Goals (SDG). These companies are required to comply with the following eligibility conditions which are based on a "pass-fail" approach:

- minimum 5% revenues exposed to SDGs, according to the internal Taxonomy framework based on Sustainable Transition Activities (demographic transition and/or healthcare transition and/or economic transition and/or lifestyle transition and/or ecologic transition).
- minimum rating of 2 out of 10 on Corporate Responsibility Rating (taking into account controversies and PAI) combined with the exclusion policy, integrating the Do Not Significantly Harm on any environmental or social objective (see below).
- minimum rating of 2 out of 10 on Governance (Corporate Governance Practices).

The minimum rate of 2 of 10 (Corporate Responsibility in the proprietary tool ABA) is in line with the objective to Do No Significant Harm to the social or environmental objectives.

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 adverse impacts of the companies' activities on environment and social objectives are directly integrated into the ABA Corporate Responsibility Rating (which integrates the indicators for adverse impacts on sustainability factors in Table 1 of Annex 1 of the SFDR RTS and may lead to a downgrading of the ABA scoring under the minimum rating).

In this background, the Management Company is implementing in accordance with its Exclusion Policy the following exclusions:

- thermal coal and unconventional oil and gas: the Management Company will gradually exclude companies involved in thermal coal and unconventional oil and gas business (please refer to the section below regarding the Sub-Fund's binding elements of the investment strategy for further details)
- controversy weapons: issuers are excluded from all the Management Company portfolios
- non-compliance with UN Global Compact: issuers with severe breaches to UN Global Compact principles are integrated in the Management Company "Worst Offenders" list and excluded from all the portfolios

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

Principal Adverse Impacts are part of the Key Performance Indicators (the KPI) collected for the analysis. Issuers with severe Principal Adverse Impacts will be unfavourably noted by the ABA Corporate Responsibility Rating. A minimum rating of 2 out of 10 is thus consistent to the DNSH approach (Do No Significant Harm to the social or environmental objectives).

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

Issuers that do not comply with the principles of the United Nations Global Compact are unfavorably rated for Corporate Responsibility in the ABA tool.

Issuers with controversies or in severe breach to UN Global Compact Principles (example: human rights or fight against corruption) based on the internal approach are excluded from the portfolio through the worst offenders list after internal analysis.

The "internal approach" as described below allow the Management Company to define a list of issuers identified as being in breach of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and which have been qualified as having committed a "severe breach" by the Management Company's Ethics Committee. These issuers are

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.

therefore included in an exclusion list of the "worst offenders" and which are prohibited from investing.

To perform this analysis, the Management Company uses an external data provider's database to:

- 1) extract issuers with "norms based" alerts;
- 2) filter out irrelevant issuers;
- 3) qualitative analysis of the infringements by the Management Company's Ethics Committee;
- 4) include issuers identified as having committed a "severe breach" in the list of worst offenders.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

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

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



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

☒ Yes, _____

For Private issuers, the Sub-Fund is taking into account the principal adverse impacts on sustainability factors.

- the Principal Adverse Impact analysis is part of the Corporate Responsibility Rating (see below).
- the Management Company is implementing an Adverse Impact on Sustainability Policy, measuring the PAI. The Policy first intend to monitor the contributions to climate change (CO2 emissions, CO2 intensity, implied temperature) in the context of the "Climate Trajectory" objectives.

For public issuers, the Sub-Fund is taking into account the principal adverse impacts on sustainability factors.

- the Principal Adverse Impact analysis is part of the Country Rating (see below).
- the Management Company is implementing an Adverse Impact on Sustainability Policy, measuring the PAI. The Policy first intend

to monitor the contributions to climate change (CO2 intensity) and social issues (Country submitted to social violation, average income inequality score) and corruption (average corruption score).

Further information may be found in the annual report in respect of the Sub-Fund.

No



What investment strategy does this financial product follow?

The investment process is based on the following three stages:

- selection of the investment universe combining a financial and extra-financial approach in particular by excluding issuers while have a high-risk profile in terms of corporate responsibility (rating below 2/10 in the ESG proprietary tool) or major controversies,
- asset classes' allocation depending on the analysis of the investment environment and the risk appetite of the management team, and
- the selection of securities based on a fundamental analysis from the point of view of the minority shareholder and/or bondholder, taking into account ESG criteria and the valuation of instruments.

The ABA scoring: proprietary tool of analysis and Corporate Responsibility Rating Corporate responsibility is a useful information's pool used to anticipate companies' risks especially looking at the interplay with their stakeholders: employees, supply chains, clients, local communities, and shareholders..., regardless of the sector of activities.

For private issuers, the ABA analysis of corporate responsibility is broken down into four pillars:

- shareholders responsibility (board of directors and general management, accounting practices and financial risks, etc.),
- environmental responsibility (environmental footprint of the production chain and product life cycle or responsible supply, energy consumption and water consumption, company CO2 emissions and management of waste, etc.),
- responsibility towards workers ethics and working conditions of the production chain, treatment of employees – safety, well-being, diversity, employee representation, wages, quality of products or services sold, etc.), and
- societal responsibility (Product quality, safety and traceability, respect of local communities and human rights, etc.

Each pillar is rated independently by the Management Company and weighted in accordance to how material it is for the targeted company. Each pillar is broken down into a set of criteria, selected in accordance to the materiality (correlation with the economic performance), which are around 25 in total (as listed in the below

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

table). Those criteria can be quality of board assessment, CEO remuneration, impact on biodiversity, climate policy and energy efficiency, etc.

Shareholder Responsibility	Respect for minority	Control structure
		Poison pill, limitation of votes
	Quality of Management	Size and composition of the ExCom
		Rotation of leaders, checks and balances
		Quality of the strategy
	Independence of Board and committees	Independence rate of the Board and its committees
		Separation of powers of the CEO/Chair
		Composition and size of the Board, fees and attendance
	CEO compensation	Transparence of compensation
		Variable compensation consistent with objectives and results
		ESG criteria in the variable compensation
	Accounting Risks	History of accounting irregularities (10 years)
		Change in accounting methods/reporting
		Independence of the statutory auditors
	Quality of financial reporting	Trust in guidance and transparency
Profit warning history		
Access to management		
Environmental Responsibility	Environmental management	Environmental Management System (EMS) and reporting scope
		Quality and consistency of reporting, quantified objectives
		Governance: dedicated director
	Climate policy and energy efficiency	Implementation of an energy efficiency policy
		Precise reporting and quantified objectives (scope 1, 2 and 3, CO2 emissions, carbon intensity)
	Regulation and certification	Perimeter of the environmental certification process
		Integration of regulations related to the sector
		Revenue associated with green/brown activities
	Impact on biodiversity and externalities	Management of positive contributions to biodiversity and reporting
		Integration of upstream issues in projects
		History of accidents or pollution
		Water consumption
		Waste recycling

Employer Responsibility	Corporate culture and HR management	HR's position in the company's hierarchy
		Leadership and culture type
		Distribution of full-time employees (FTEs)
		Employee share ownership
	Health and safety	Establishment of committees and procedures for hygiene, safety and working conditions
		Workplace accident history, lever of reporting (accident frequency, gravity, number of fatalities)
		Transparency and scope of indicators
	Labor relations and working conditions	Quality of social dialogue, average absenteeism, turnover rates
		History of employee conflicts
		Quality of working conditions and compliance with legislation
	Training and career management	Training pan and age pyramid
		Sector-specific transition issues
		Employee seniority and internal mobility policy
		Training budget, number of training hours/employee
	Promoting diversity	Share of women among employees
		Share of women on management teams
Promotion of local managers		
Attractiveness and recruitment	Attractiveness of the sector and the company (Glassdoor rating, average salary/FTE)	
	Talent attraction program	
	Ability to hire people with key skills	
Societal Responsibility	Product quality, safety and traceability	Product quality control process
		History of quality defects
		Consumer safety issues
		Internal or external R&D management
	Innovation capacity and pricing power	Employees dedicated to R&D, R&D budget
		Pricing power and brand power
		Supply chain control and model (integrated or heavy outsourcing), limitation of cascading suppliers
	Supply chain management	History of supply chain failure
		ESG included in the contracts with suppliers
		Customer satisfaction monitoring policy, change in market share
	Customer satisfaction and market share gains	Organic growth trends
		Quality of the B-to-B distribution network
		Customer complaint history
	Respect for local communities and human rights	Respect for human rights, facilitating the right to operate
		Integration of local communities
History of local conflicts		
Use of personal data as a business model		
	Protection of sensitive data and privacy	

Cybersecurity & the protection of personal data	Protection mechanisms against cyber attacks
Corruption and business ethics	Governance and corruption prevention process
	Operations in high-risk countries
	History of corrupt or unethical practices

Furthermore, the monitoring of the level of controversy is taken into account directly in the corporate responsibility and may affect the rating.

This in-depth analysis, combining qualitative and quantitative research, leads to a rating out of 10.

With respect to investments in public issuers, this asset class is subject to an extra-financial analysis in 4 dimensions comprising:

- ESG risk analysis,
- International standards infraction,
- International convention engagement,
- Climate profile.

ESG risks analysis is made of 4 pillars, rate from 0 to 10:

- Governance: this pillar reviews Rule of law and respect for freedom, Quality and transparency of institutions and regulatory framework, Military status and defense, Democracy.
- Environment: this pillar reviews Agriculture, Climate change, Energy, Waste management and recycling.
- Social: this pillar reviews Education and training, Job, Health.
- Society: Living conditions, freedom and respect for fundamental rights, Inequalities.

International standards infraction is a binary approach to qualify the infraction to: Child labor, Discrimination, Freedom of association, Money laundering, Labor rights, Human rights, Freedom of press and Torture practices.

International convention engagement is a binary approach to identify the commitment to SDGs (UN Sustainable Development Goals), Kyoto Protocol, Accord de Paris, UN-Biodiversity Convention, Coal exit, Coal power capacity, nuclear weapons Non-Proliferation Treaty and Fight against money laundering and the financing of terrorism.

Climate profile is a combination of Energy mix, evolution of the Energy mix, Carbon intensity and primary energy reserve.

- *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?*

On one hand, the Sub-Fund implements its strategy within two types of bindings elements: exclusions applied for the Management Company, and exclusions specific to the strategy.

1. Exclusions applied for the Management Company:
 - Exclusion based on United Nations Global Compact breaches: after analysis and decision by the Management Company, companies are listed by the Management Company on a "worst offenders" list and excluded from all portfolios.
 - Exclusion related to the Management Company engagement to disinvest in non-conventional oil and gas activities and coal activities based on sector activities, according to the table below:

Activities	Exclusion from March 2022	Issuers having their registered office in the European Union or in the EOC		Issuers having their registered office outside of the EOC	
		Exclusion from December 2027	Exclusion from December 2027	Exclusion from December 2030	Exclusion from December 2040
Thermal Coal Production	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	Definitive exit (0% of the revenues)
Coal-based electricity generation	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	Definitive exit (0% of the revenues)

Activities		Exclusion from December 2027	Exclusion from December 2027	Exclusion from December 2030	Exclusion from December 2040
Production of unconventional oil of gas	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	From 5% of the revenues

2. Exclusions specific to the strategy followed by the Sub-Fund:
 - Exclusions of private issuers which have a "Severe Risk" profile in terms of Corporate Responsibility or country score for public issuers. Rating below 2 out of 10 within our internal rating.
 - Sectorial Exclusions as defined in the Management Company's "Exclusion Policy".

The above-mentioned applied exclusions which are further detailed in the Management Company's "Exclusion Policy" and "Responsible Investor Policy" are binding and further details thereon are available on the website of the Management Company (<https://www.dnca-investments.com/lu/areas-of-expertise/sri>). Details of the Sub-Fund's exclusion policy are also available from the Management Company upon request.

Moreover, a strict controversial weapons exclusion and sectorial exclusion policy is implemented and is available on the website of the Management Company (<https://www.dnca-investments.com/lu/areas-of-expertise/sri>).

On the other hand, the Sub-Fund is also bound to comply with the 20% minimum proportion of sustainable investments determined in accordance with the criteria described under the section « *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?* ».

- ***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 applies a minimum reduction of the investment universe of 20%.

- ***What is the policy to assess good governance practices of the investee companies?***

For private issuers, the Governance is one the assessment axes of the Corporate Responsibility: The Shareholder Responsibility. It is rated out of 10 based on 6 criteria: sound management structures (i.e. the quality of the management the board and committees of the issuer), overall issuers' remuneration of staff (focusing on the CEO's remuneration) and tax compliance (alignment of the tax rate with the local economic presence, presence in tax havens, change in the tax rate over 10 years), a good employee relation, the quality of the financial communication, the accounting risks and the respect for minority shareholders. Around thirty KPIs allow the assessment of the governance practices associated with these 6 criteria. In addition, controversies related to the good governance practices impact the overall rating.

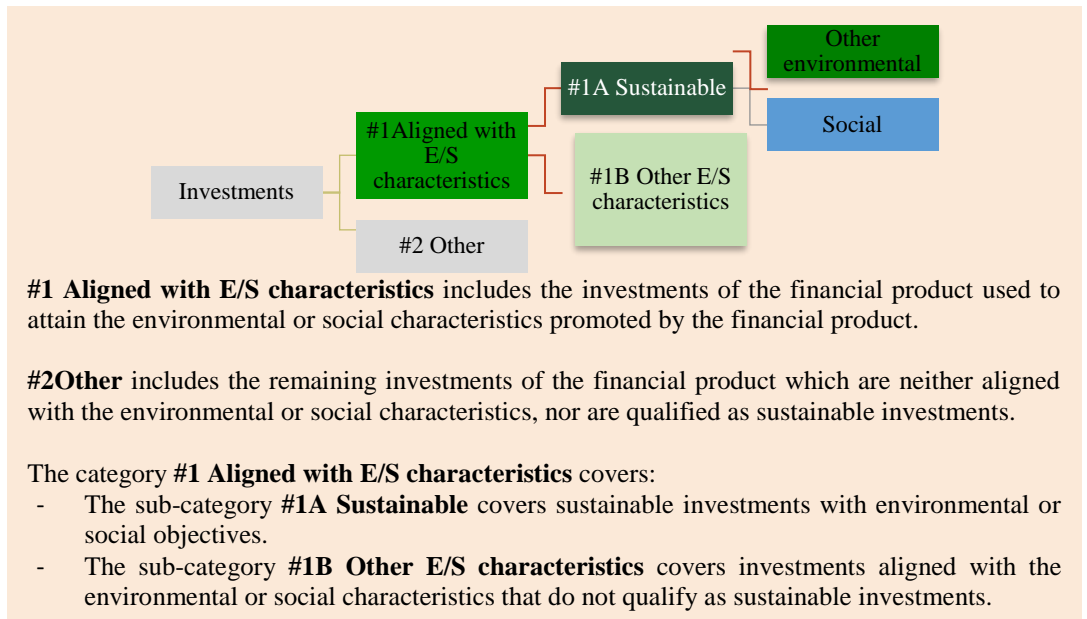
For public issuers, the Governance is one of the assessment axes. It is rated out of 10 based on 4 pillars: Rule of law and respect for freedoms, Quality of institutions and regulatory framework, Democratic life and Military status and defense. Around twenty KPIs allow the assessment of the governance practices associated with these 4 pillars.

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?

The Sub-Fund intends to invest 80% minimum of its net assets in investments aligned with the environmental and social characteristics it promotes and 20% of those are directly invested in sustainable investments. The remaining portion of the Sub-Fund's net assets (#2 Other) will consist of financial derivative instruments, deposits at sight, money market funds, money market instruments and other deposits used for hedging and/or exposure and efficient portfolio management purposes and to manage the liquidity of the portfolio or to reduce any specific financial risk.



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

The Sub-Fund does not invest in financial derivative instruments in order to attain the environmental or social characteristics it promotes.



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

Not Applicable.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

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

To 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. **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.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹⁰?**

☐ Yes:

☐

In fossil gas

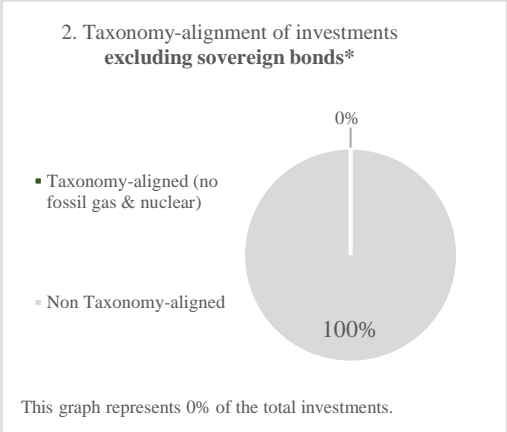
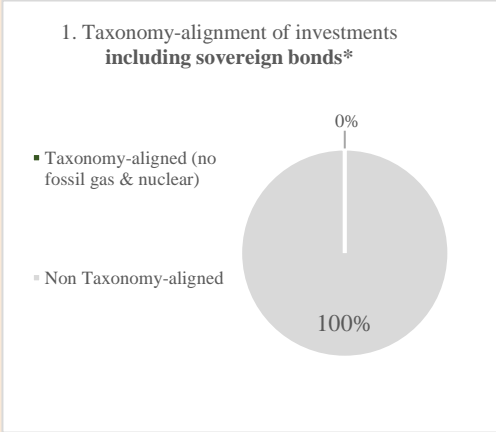
☐

In nuclear energy

☒

No

The two graphs below show in green 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.*



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

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

0%

¹⁰ 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.



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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund will invest at least 1% of its net assets in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy Regulation. However, the aggregated minimum share of sustainable investments across both environmental and social objectives represents 20% of its net assets.



What is the minimum share of socially sustainable investments?

The Sub-Fund will invest at least 1% of its net assets in socially sustainable investments. However, the aggregated minimum share of sustainable investments across both environmental and social objectives represents 20% of its net assets.



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

The Sub-Fund may invest in financial derivative instruments, deposits at sight, money market funds, money market instruments and other deposits included under "#2 Other". Those instruments may be used by the Management Company to manage the liquidity of the portfolio, to increase exposure or to reduce any specific financial risk (for example: currency risk).

No minimum environmental or social safeguards will be in place in relation to such assets.



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?

The reference benchmark of the Sub-Fund does not intend to be consistent with the environmental or social characteristics promoted by the Sub-Fund.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

N/A

- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

N/A

- *How does the designated index differ from a relevant broad market index?*

N/A

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

- *Where can the methodology used for the calculation of the designated index be found?*

N/A



Where can I find more product specific information online?

More product-specific information can be found on the website: <https://www.dnca-investments.com/lu/funds/dnca-invest-eurose/units/a-lu0284394235> by clicking on section "Documents" and accessing the ESG information under the sub-section "SRI Documents".