

# Assurance de groupe pour salariés

## 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)

Pour les assurance de groupes, l'organisateur a le choix parmi 46 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 fonds ( 67,39 % du nombre total de fonds) sont classés au titre de l'article 8 du SFDR, 6 fonds ( 13,04 % du nombre total de fonds) sont classés au titre de l'article 9 du SFDR et 9 fonds ( 19,57 % 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 sous « Documents nécessaires » :

- **MultiPlan et MultiPlan+** : <https://www.nn.be/fr/entreprises/multiplan>
- **Alto Cash Balance** : <https://www.nn.be/fr/entreprises/alto-cash-balance>
- **Alto Bonus** : <https://www.nn.be/fr/entreprises/alto-bonus>
- **Alto Defined Contribution**: <https://www.nn.be/fr/product/alto-defined-contribution>

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 BlackRock iShares Core MSCI World UCITS ETF Fund	BlackRock	iShares Core MSCI World UCITS ETF USD (Acc)	IE00B4L5Y983	6 (2)
NN BlackRock iShares Core S&P 500 UCITS ETF Fund	BlackRock	iShares Core S&P 500 UCITS ETF USD (Acc)	IE00B5BMR087	6 (2)
NN BlackRock iShares MSCI Europe SRI UCITS ETF Fund	BlackRock	iShares MSCI Europe SRI UCITS ETF EUR (Acc)	IE00B52VJ196	8
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 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 Balanced Future Fund	Goldman Sachs Asset Management	Goldman Sachs Patrimonial Balanced Future (B)	BE6313167197	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 Life Multi Invest High Fund	NN Insurance Belgium	NN Life Multi Invest High Fund	N/A	6 (4)
NN Life Multi Invest Low Fund	NN Insurance Belgium	NN Life Multi Invest Low Fund	N/A	6 (4)
NN Life Multi Invest Medium Fund	NN Insurance Belgium	NN Life Multi Invest Medium Fund	N/A	6 (4)
NN Life Multi Invest Medium Low Fund	NN Insurance Belgium	NN Life Multi Invest Medium Low Fund	N/A	6 (4)
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)

(4) <https://www.nn.be/fr/propos-de-nn/publication-dinformations-en-matiere-de-durabilite>

**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.



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

**Product Name:** M&G (Lux) Investment Funds 1 - M&G (Lux) Global Listed Infrastructure Fund  
**Legal Entity Identifier:** 222100K85SU14IF7PW30

## 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 51% 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 Fund promotes the use of an Exclusionary Approach and that it makes investments that are SDG-aligned (as defined below):

The Fund excludes certain potential investments from its investment universe to mitigate potential negative effects on the environment and society and to assist it in delivering more sustainable outcomes ("Exclusionary Approach").

The Fund considers the UN Sustainable Development Goals (SDGs) as part of its investment process and the sustainability themes considered by the Investment Manager are based on the SDGs as a relevant framework to measure contribution to sustainability factors ("SDG-alignment"). At least 70% of the Fund's investments by value will be in investments considered by the Investment Manager to be related to sustainability themes.

No reference benchmark has been designated for the purpose of attaining the Fund's promoted environmental and/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?

The sustainability indicators selected to demonstrate the attainment of the promoted environmental and/or social characteristics are:

- Exclusionary approach: Percentage (%) of NAV held in excluded investments
- SDG-alignment: Percentage (%) of investments by value that is SDG-aligned

### 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 Fund may allocate to sustainable investments of any type, i.e. investments with an environmental, and/or a social objective. The Fund is not required to favour any specific type of sustainable investment.

The Investment Manager uses a series of proprietary tests based on available data to determine whether and how an investment makes positive contribution(s) towards environmental and social objectives.

**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.

- **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?**

Sustainable investments that the Fund intends to make do not cause significant harm to any environmental or social sustainable investment objective as they are required to pass a series of tests, including:

1. Whether they represent significant exposure to businesses the Investment Manager considers harmful
2. Principal Adverse Impact indicators considered to render the investment incompatible with sustainable investment (violations of the UN Global Compact Principles or the OECD Guidelines for Multinational Enterprises, social violations by sovereigns such as being subject to sanctions, negative effects on biodiversity sensitive areas)
3. Other Principal Adverse Impact indicators form part of a materiality assessment to understand whether any exposures are compatible with sustainable investment

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

The Investment Manager's research process includes consideration of Principal Adverse Impact indicators for all investments where data is available (i.e. not just for sustainable investments), which allows the Investment Manager to make informed investment decisions.

The Fund's consideration of Principal Adverse Impact indicators is used as part of understanding the operating practices of the investments purchased by the Fund.

Investments held by the Fund are then subject to ongoing monitoring and a quarterly review process.

Further information on the Principal Adverse Impact indicators which are taken into account by the Investment Manager can be found in the Annex to the Investment Manager's website disclosures for the Fund.

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

All investments purchased by the Fund must pass the Investment Manager's good governance tests, and in addition, sustainable investments must also pass tests to confirm they do no significant harm, as described above. These tests embed a consideration of the OECD Guidelines and UN Guiding Principles.

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 sustainable investments, principal adverse impacts are a key part of assessing such investments do not do significant harm as explained above. For other investments the Investment Manager's research process includes consideration of Principal Adverse Impact indicators for all investments where data is available, which allows the Investment Manager to make informed investment decisions, as explained above.

Further information on the Principal Adverse Impact indicators which are taken into account by the Investment Manager can be found in the Annex to the Investment Manager's website disclosures for the Fund. Information on how the principal adverse impacts were taken into account will be provided in the Fund's annual report.

- ☐ No



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

### What investment strategy does this financial product follow?

Sustainability considerations, encompassing ESG factors, are fully integrated into analysis and investment decisions, and play an important role in determining the investment universe and portfolio construction. The Fund considers the UN Sustainable Development Goals (SDGs) as part of its investment process and the sustainability themes considered by the Investment Manager are based on the SDGs as a relevant framework to measure contribution to sustainability factors ("SDG-alignment").

In doing so, the Investment Manager assesses investee companies as "relating to a sustainability theme" if at least 50% of its revenue is SDG-aligned. For the avoidance of doubt this assessment can include alignment to more than one SDG as part of a broader theme. At least 70% of the Fund's investments by value will be in investments considered by the Investment Manager to be related to sustainability themes. In order to identify securities for purchase, the Investment Manager reduces the potential investment universe as follows:

1. The exclusions listed in the Investment Policy are screened out.
2. The Investment Manager then identifies the companies that are considered suitable for further analysis. The Investment Manager analyses these companies from an ESG perspective using a proprietary infrastructure sector-specific quality assessment. This includes an assessment of ESG Factors, alongside other financial and operational characteristics. Following the ESG-related quality assessment, the Investment Manager then quantifies ESG risks for these companies, to determine whether these have been accounted for in a company's valuation.
3. From this narrowed investment universe, the Investment Manager then performs further analysis, including consideration of ESG factors, to identify and take advantage of investment opportunities.

### ● 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 following elements are binding, as part of the Investment Manager's strategy for this Fund:

- The Fund's exclusions;
- The amount of the Fund aligned to the promoted environmental and/or social characteristics as set out in the section ""What is the asset allocation planned for this financial product?""; and
- Minimum levels of sustainable investments as set out in the section ""What is the asset allocation planned for this financial product?"".

Where it is in the best interests of investors, the Fund may temporarily deviate from one or more of these elements, for example if the Investment Manager considers it prudent to hold high levels of cash in response to market conditions.

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

20%

Whilst any commitment on the minimum rate to reduce the scope of the investments considered prior to the application of the investment strategy as a result of the Fund's exclusions is intended to be binding, as this is calculated by considering the Fund's exclusions against a proxy for the investment universe (such as a financial index) outside the control of the Investment Manager, and as additional exclusions will require an update of fund materials, it is possible that the Fund may temporarily be out of compliance with this commitment.

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

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

The Investment Manager operates a data driven quantitative good governance test used to consider investments into companies. M&G excludes investments in securities that are considered as failing the Investment Manager's good governance test. When assessing good governance practice the Investment Manager will, as a minimum, have regard to matters it sees relevant to the four identified pillars of good governance (sound management structures, employee relations, remuneration of staff and tax compliance).



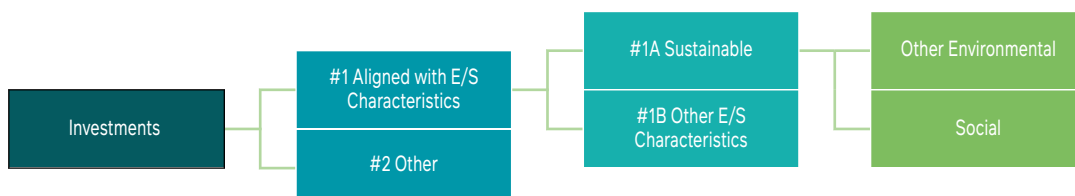
**Asset allocation** describes the share of investments in specific assets.

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

The Investment Manager expects at least 70% of the fund to be aligned to the promoted E/S characteristics. At least 51% of the fund will be in Sustainable Investments.

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.



**#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 promoted environmental and/or social characteristics.



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

0%

Whilst the minimum mandatory allocation to Taxonomy-aligned sustainable investments is 0%, the Fund is permitted to allocate to such investments, which would form part of its overall allocation to sustainable investments with environmental objectives.

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

☐ Yes:

☐ In fossil gas

☐ In nuclear energy

☒ No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives -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.

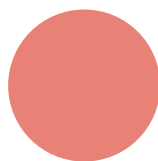
**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

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

**The two graphs below show 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.**

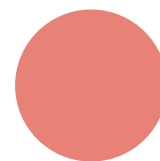
1. Taxonomy-alignment of investments including sovereign bonds\*

■ Taxonomy-aligned (0%)  
■ Other investments (100%)



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

■ Taxonomy-aligned (0%)  
■ Other investments (100%)



This graph represents 100% of the total investments\*\*

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

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

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

0%

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?**

5%



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

5%



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

The Fund may hold cash, near cash and money market funds and derivatives as “Other” investments, for any purpose permitted by the Fund’s investment policy. No minimum environmental or social safeguards are applied, other than as set out below.

Derivatives used to take investment exposure to diversified financial indices, and funds (i.e. UCITS and other UCIs) may be held for any reason permitted by the Fund’s investment policy and will be subject to such minimum environmental or social safeguard tests as the Investment Manager considers appropriate, for example a minimum weighted ESG score test. No minimum environmental or social safeguards are applied to FX derivatives.

The Fund may also hold as Other investments those investments where insufficient data exists to determine the investments’ alignment with the promoted characteristics. It is also possible that the Fund may hold investments that are not in line with the promoted characteristics, e.g. as a result of a merger or other corporate action, or as a result of the characteristics of a previously acquired investment changing. Where this happens, the Fund will generally seek to dispose of them in the best interests of investors, but may not always be able to do so immediately.



**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?**

No

**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.mandg.com/country-specific-fund-literature](http://www.mandg.com/country-specific-fund-literature)