

NN Strategy niet-fiscaal

NN Scala Invest

Precontractueel document inzake duurzaamheid

Precontractuele informatie voor financiële producten als bedoeld in artikel 8, leden 1, 2 en 2 bis, van Verordening (EU) 2019/2088 en in artikel 6, eerste alinea, van Verordening (EU) 2020/852, en overeenkomstig artikel 20 van Gedelegeerde Verordening (EU) 2022/1288

Versie : 20/10/2023

De duurzaamheidsinformatie in dit precontractuele productdocument werd naar best vermogen opgesteld door NN Insurance Belgium nv op basis van de informatie die hierover momenteel beschikbaar is bij de asset managers. De regelgeving die deze asset managers verplicht om deze informatie beschikbaar te stellen is echter pas op 1 januari 2023 in werking getreden. De informatie in dit document kan worden gewijzigd en/of aangevuld naargelang van de informatie die de asset managers in de komende maanden zullen verstrekken.

1. Transparantie van duurzaamheidsrisicobeleid

Op grond van artikel 3 van de Sustainable Finance Disclosure Regulation ("SFDR") is NN Insurance Belgium ("NN IB") verplicht om informatie te verstrekken over haar beleid inzake de integratie van duurzaamheidsrisico's in ons beleggingsbeslissingsproces. De SFDR definieert duurzaamheidsrisico als een milieu-, sociale of governance-gebeurtenis of -voorwaarde die, als deze zich voordoet, een feitelijke of een potentiële materiële negatieve impact op de waarde van de belegging kan veroorzaken. Deze openbaarmakingen worden hieronder vermeld.

Environmental, Social and Governance (ESG) factoren en risico's

NN IB beschouwt duurzaamheidsrisico's als risico's die verband houden met milieu-, sociale en governance factoren ("ESG-factoren") die een wezenlijk negatief effect kunnen hebben op de prestaties, reputatie, waarde, balans of activiteiten van NN Group op de lange termijn.

Met betrekking tot SFDR omvat dit ESG-factoren die een wezenlijk negatief effect kunnen hebben op de waarde van beleggingen in de financiële producten van NN IB-kanten. Voorbeelden van dergelijke Environmental, Social and Governance (ESG) factoren zijn:

- **Milieufactoren:** klimaatverandering, andere vormen van aantasting van het milieu (bv. luchtverontreiniging, waterverontreiniging, schaarste aan zoet water, bodemverontreiniging, verlies van biodiversiteit en ontbossing) en dierenwelzijn, naast corrigerende beleidsmaatregelen die gericht zijn op het aanpakken van dergelijke factoren. Klimaatverandering is verder onderverdeeld in
 - a) overgangseffecten als gevolg van de overgang naar een koolstofarme/groene economie en
 - b) fysische effecten als gevolg van veranderingen in weerpatronen, temperatuur, hydrologische omstandigheden of natuurlijke ecosystemen (zowel acute als langere termijnverschuivingen).
- **Sociale factoren:** Rechten, welzijn en belangen van mensen en gemeenschappen, waaronder mensenrechten, (on)gelijkheid, gezondheid, inclusie, diversiteit, werknemersrechten en arbeidsverhoudingen, gezondheid en veiligheid op de werkplek.
- **Governance factoren:** Het nastreven of toepassen van goede governance praktijken, waaronder uitvoerend leiderschap, beloning van bestuurders, audits, interne controles, belastingontwijking, onafhankelijkheid van de raad van bestuur, aandeelhoudersrechten, anticorruptie en anti-omkoping, en ook de manier waarop bedrijven of entiteiten milieu- en sociale factoren opnemen in hun beleid en procedures.

NN Risk taxonomie

NN IB heeft haar generieke inherente risicolandschap gedefinieerd en gecategoriseerd in een Risicotaxonomie. NN IB beschouwt duurzaamheidsrisico's als transversale risico's. Dit betekent dat we duurzaamheidsrisico's beschouwen als manifest door risicotypen die worden erkend in risicotaxonomie. De risico's die in de risicotaxonomie worden geïdentificeerd, hebben betrekking op verschillende risicogebieden, zoals opkomende risico's, strategische risico's, financiële risico's en niet-financiële risico's. Deze hebben betrekking op de eigen activiteiten en producten van NN IB, maar ook op de investeringen die worden gedaan. Binnen de risk taxonomie zijn ESG-factoren in kaart gebracht op belegging gerelateerde risicocategorieën. Deze ESG-factoren worden gezien als risicofactoren, wat betekent dat wij van mening zijn dat deze ESG-factoren de risiconiveaus van de verschillende geïdentificeerde belegging risicocategorieën kunnen bepalen. Voorbeelden van dergelijke risicocategorieën zijn activarisico.

Toepassing in investeringsbeslissingen

Er zijn verschillende manieren waarop NN IB duurzaamheidsrisico's meeneemt in het beleggingsbeslissingsproces. De exacte manier waarop dit wordt gedaan, is niet statisch, omdat onze aanpak in de loop van de tijd evolueert op basis van verkregen inzichten, opkomende marktpraktijken, beschikbaarheid van relevante en robuuste gegevens en tooling en ontwikkelingen in de regelgeving. Daarnaast hangt de manier waarop duurzaamheidsrisico's kunnen worden overwogen ook af van de specifieke investering of productpropositie – er kunnen dus verschillen zijn tussen de algemene benadering en de benadering die wordt toegepast op specifieke beleggings- of productproposities. De belangrijkste gebieden waarop NN IB duurzaamheidsrisico's in het beleggingsbeslissingsproces beschouwt, zijn de volgende.

#	Gebied	Omschrijving:
1	Toepassing door NN IB van het <i>Responsible Investment Framework policy</i> van NN Group ("RI Framework policy") bij de beheerders- en fondsselectie en op portefeuilleniveau	<p>NN Group heeft een uitgebreid Responsible Investment Framework beleid, dat een reeks onderwerpen omvat, zoals actief aandeelhouderschap (betrokkenheid en stemmen), beperkingen en de systematische integratie van materiële duurzaamheidsrisico's en -kansen in het onderzoek en de analyses van beleggingen. Wij geloven dat door de toepassing van deze eisen en methoden duurzaamheidsrisico's direct of indirect worden verlaagd voor de investeringen die we doen. Hoewel beperkingen vaak gebaseerd zijn op onze waarden en maatschappelijke normen, dragen ze ook bij aan het verlagen van activarisico's – beperkingen op investeringen in bedrijven die betrokken zijn bij thermische steenkool zullen naar verwachting bijvoorbeeld het risico verlagen dat dergelijke investeringen gestrande activa worden. Raadpleeg https://www.nn-group.com/sustainability/responsible-investment/responsible-investment-policy-framework.htm voor meer informatie over het beleid van het NN Group Responsible Investment Framework.</p> <p>Omdat NN IB belegt via externe beheerders, houden we rekening met ESG-criteria in het selectieproces van externe vermogensbeheerders. Deze vermogensbeheerders beheren hun fondsen volgens hun eigen strategie en NN IB beslist om er al dan niet in te beleggen.</p> <p>Deze criteria zijn opgenomen in het proces van due diligence en selectie, monitoring en evaluatie van de manager, waarin NN IB beoordeelt of de beheerder beschikt over passende structurele processen en methodologieën met betrekking tot de belangrijkste gebieden van het beleid van NN Group voor verantwoord beleggen, waaronder duurzaamheidsrisico's.</p>
2	Product Approval and Review ("PAR") proces	Als onderdeel van het Product Approval and Review (PAR) proces analyseert en documenteert NN IB hoe eventuele duurzaamheidsrisico's van invloed kunnen zijn op de verplichtingen (zogenaamde <i>claims</i>) van een specifiek product, waarbij ook rekening wordt gehouden met de looptijd van de verplichtingen.
3	Risicobeoordelingen	NN IB voert regelmatig risicobeoordelingen uit. Een kwalitatieve risicobeoordeling van duurzaamheidsrisico's wordt uitgevoerd om risico's te identificeren en waar nodig risicobeperkende maatregelen te bepalen.

2. Indeling van de fondsen (beleggingsopties)

NN Strategy-niet fiscaal/Scala Invest bestaat uit 40 onderliggende beleggingsfondsen, waarvan sommige ecologische en/of sociale kenmerken promoten of een duurzame beleggingsdoelstelling nastreven. Het interne fonds belegt voor 100% in het onderliggende beleggingsfonds. De doelstelling en beleggingsbeleid van het interne fonds komt 100% overeen met de doelstelling en het beleggingsbeleid van het onderliggende beleggingsfonds.

Op basis van de informatie van de vermogensbeheerder van de onderliggende beleggingsfondsen werden deze onderliggende beleggingsfondsen ingedeeld als artikel 6¹ of 8² of 9 SFDR³.

31 van de fondsen (77,50 % van het totaal aantal fondsen) zijn ingedeeld als artikel 8 SFDR, 6 fondsen (15,00 % van het totaal aantal fondsen) zijn ingedeeld als artikel 9 SFDR en 3 fondsen (7,50 % van het totaal aantal fondsen) zijn ingedeeld als artikel 6 SFDR.

Voor fondsen ingedeeld als artikel 8 en 9, is nadere informatie over de duurzame kenmerken beschikbaar op de productpagina op onze website :

- **NN Strategy niet-fiscaal:** <https://www.nn.be/nl/prive/beleggen/nn-strategy-vrij-beleggen-tak-23-niet-fiscaal>
- **NN Scala Invest:** <https://www.nn.be/nl/product/nn-scala-invest-vrij-beleggen-tak-23>

onder “Belangrijke documenten”.

De informatie met betrekking tot het in overweging nemen van de belangrijkste ongunstige effecten van beleggingsbeslissingen op de duurzaamheidsfactoren opgenomen door de onderliggende beleggingsfondsen is beschikbaar in de precontractuele informatieverschaffing voor elk van deze beleggingsopties. Bij de selectie van de beleggingsopties voor dit product was de inachtneming van deze belangrijkste ongunstige effecten echter niet doorslaggevend.

3. Classificatie van het product

NN Insurance Belgium nv heeft dit product geclassificeerd als artikel 8 SFDR omdat het ecologische en/of sociale kenmerken promoot. Opdat het product voor de verzekeringnemer onder artikel 8 SFDR kan worden ingedeeld, moet het financiële product worden belegd in ten minste één van de beleggingsopties die worden ingedeeld als artikel 8 of 9 in de onderstaande lijst en moet ten minste één van deze beleggingsopties worden aangehouden gedurende de periode dat het product wordt aangehouden.

¹ Artikel 6 SFDR: het fonds promoot geen ecologische en/of sociale kenmerken en streeft geen duurzame beleggingsdoelstellingen na.

² Artikel 8 SFDR: het fonds promoot ecologische en/of sociale kenmerken.

³ Artikel 9 SFDR: het fonds streeft een duurzame beleggingsdoelstelling na.

Lijst van beleggingsfondsen:

Naam van het interne fonds	Naam van de vermogensbeheerder	Naam van het onderliggende beleggingsfonds	ISIN code	SFDR classificatie
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

De Europese SFDR-verordening voorziet niet in een specifieke bijlage voor artikel 6-fondsen. Waar relevant wordt informatie over de belangrijkste negatieve effecten (PAI) op duurzaamheidsfactoren verstrekt via een link hieronder.

(1) <https://www.gsam.com/responsible-investing/nl-BE/non-professional/about/verklaring-belangrijkste-ongunstige-effecten-op-duurzaamheid>

(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/statement-on-impacts-of-investment-decisions-on-sustainability-factors\(en\).pdf](https://www.capitalgroup.com/content/dam/cgc/tenants/eacg/esg/files/statement-on-impacts-of-investment-decisions-on-sustainability-factors(en).pdf)

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: **Pictet - Global Megatrend Selection**

Legal entity identifier: **549300HMJRYVBYQOZ025**

Environmental and/or social characteristics

<p>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.</p> <p>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.</p>	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 sustainable investments with an environmental objective : ____%	<input checked="" type="checkbox"/> 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	
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> with an environmental objective 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 checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective : ____%	<input checked="" type="checkbox"/> with a social objective	
	<input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments	

Note: Sustainable investments are calculated on a pass/fail basis including labelled bonds (where relevant to the asset class), and securities from issuers with minimum 20% exposure (as measured by revenue, EBIT, enterprise value or similar metrics) to economic activities that contribute to environmental or social objectives.



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

The environmental and social characteristics of this financial product are:

- **Positive impact:**

The fund seeks to achieve a positive environmental and/or social impact by investing at least two-thirds of its total assets in securities that may benefit from global megatrends, i.e. long-term market trends resulting from secular changes in economic, social and environmental factors such as demographics, lifestyle or regulations.

The fund invests mainly in companies whose significant proportion of their activities are related to products and services supporting the energy transition, circular economy, energy efficiency, water quality and supply, sustainable forestry, sustainable cities, nutrition, human health and therapeutics, personal self-fulfilment and security and other relevant economic activities.

No reference index has been designated for the purpose of attaining the environmental or social characteristics promoted by the fund.

- **Norms- and values-based exclusions:**

The fund excludes issuers that are in severe breach of international norms or have significant activities with adverse impacts on society or the environment.

- **Active ownership:**

The fund methodically exercises its voting rights. The fund may also engage with the management of companies on material ESG issues and may discontinue investment if progress proves unsatisfactory.

- See also: “What investment strategy does this financial product follow?” and “Does this financial product consider principal adverse impacts on sustainability factors?”.

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

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

Indicators the fund uses include:

- exposure to companies that derive a significant proportion of revenue, EBIT, enterprise value or similar metrics from economic activities that contribute to environmental or social objectives
- exposure to revenues from economic activities that contribute to environmental and/ or social objectives
- overall ESG profile
- Principle Adverse Impact (PAI) indicators such as exposure to issuers that are in severe breach of international norms or have significant activities with adverse E/S impacts on society or the environment
- percentage of eligible company meetings where voting rights were exercised

● **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 mainly invests in securities financing economic activities that substantially contribute to environmental or social objectives such as:

Environmental

- climate change mitigation
- climate change adaptation
- sustainable use and protection of water and marine resources
- transition to a circular economy
- pollution prevention and control, or
- protection and restoration of biodiversity and ecosystems

Social

- inclusive and sustainable communities
- adequate living standards and well-being for end users, or
- decent work

This is achieved by investing in securities financing economic activities that substantially contribute to environmental or social objectives such as those listed above.

Eligible securities include equities issued by companies with a significant proportion of activities (as measured by revenue, EBIT, enterprise value or similar metrics) derived from such economic activities.

● **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 fund considers an investment sustainable if it does no significant harm to any E/S objective, which the investment team determines by using a combination of quantitative and qualitative assessments at issuer level. The assessments draw on both general and industry-relevant indicators, and include exposure to material sustainability risks. Periodic reviews and risk controls are in place to monitor implementation.

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

The fund considers and, where possible, mitigates adverse impacts of its investments on society and the environment through a combination of portfolio management decisions, active ownership activities, and exclusion of issuers associated with controversial conduct or activities.

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

The fund excludes issuers that are subject to severe controversies in areas such as human rights, labour standards, environmental protection and anti-corruption.

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 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 fund considers and, where possible, mitigates adverse impacts of its investments on society and the environment that are deemed material to the investment strategy through a combination of portfolio management decisions, active ownership activities, and exclusion of issuers associated with controversial conduct or activities.

Please refer to Pictet Asset Management's Responsible Investment policy for the list of PAIs.

► See also detailed information on exclusions in Pictet Asset Management's Responsible Investment policy.

☐ No



What investment strategy does this financial product follow?

Objective:

To increase the value of your investment while seeking to achieve a positive environmental and/or social impact.

Reference index:

MSCI AC World (USD), an index that does not take into account environmental, social and governance (ESG) factors. Used for performance objective and performance measurement.

Portfolio assets:

The fund mainly invests in equities of companies that appear to benefit from demographic, environmental, lifestyle and other long-term global trends. The fund may invest worldwide, including in emerging markets and Mainland China.

Derivatives and structured products:

The fund may use derivatives to reduce various risks (hedging)

and for efficient portfolio management, and may use structured products to gain exposure to portfolio assets.

Investment process:

In actively managing the fund, the investment manager uses a combination of market and fundamental company analysis to select securities that it believes offer favourable growth prospects at a reasonable price. The investment manager considers ESG factors a core element of its strategy by seeking to invest mainly in economic activities that contribute to an environmental and social objective whilst avoiding activities that adversely affect society or the environment. Voting rights are methodically exercised and there may be engagement with companies to positively influence ESG practices. For further information, please refer to our exclusion framework in the Responsible Investment policy, SFDR product category Article 8. The portfolio composition is not constrained relative to the benchmark, so the similarity of the fund's performance to that of the benchmark may vary.

Fund currency:

USD

- **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 fund's binding elements include:

- at least 51% of sustainable investments, i.e. investments in companies that have a significant exposure to activities such as products and services supporting the energy transition, circular economy, energy efficiency, water quality and supply, sustainable forestry, sustainable cities,

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

nutrition, human health and therapeutics, personal self-fulfilment and security and other relevant economic activities (as measured by revenue, enterprise value, earnings before interest and tax, or similar)

- exclusion of issuers that:

- are involved in the production of controversial weapons including anti-personnel mines, cluster munitions, biological and chemical weapons, nuclear weapons and depleted uranium
- derive a significant portion of their revenue from activities detrimental to society or the environment, such as thermal coal extraction and power generation, unconventional oil and gas exploration and production, conventional oil and gas production, nuclear power generation, conventional weapons and small arms, military contracting weapons and weapon-related products and services, tobacco production, adult entertainment production, gambling operations, genetically modified organisms development/growth, pesticides product/retail. Please refer to Pictet Asset Management's Responsible Investment policy for further details on exclusion thresholds applicable to the above activities.
- severely violate international norms including the UN Global Compact principles on human rights, labour standards, environmental protection and anti-corruption

- a better ESG profile than the reference index

- ESG criteria analysis of eligible securities that covers at least 90% of net assets or the number of issuers in the portfolio

To ensure ongoing compliance, the fund monitors the ESG profile of all securities and issuers that form part of the minimum percentage of E/S investments stated in “What is the asset allocation planned for this financial product?”. The fund draws on information from various sources, such as proprietary fundamental analysis, ESG research providers, third-party analyses (including those from brokers), credit rating services and financial and general media. Based on this information, the investment manager may decide to add or discontinue certain securities, or increase or decrease its holdings in certain securities.

- ▶ See also: “What investment strategy does this financial product follow?” and “Does this financial product consider principal adverse impacts on sustainability factors?”.

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

Not applicable

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

The fund assesses company decision-making processes and controls, as well as how management balances the interests of shareholders, employees, suppliers, customers, the community and other stakeholders.

Assessed areas may include:

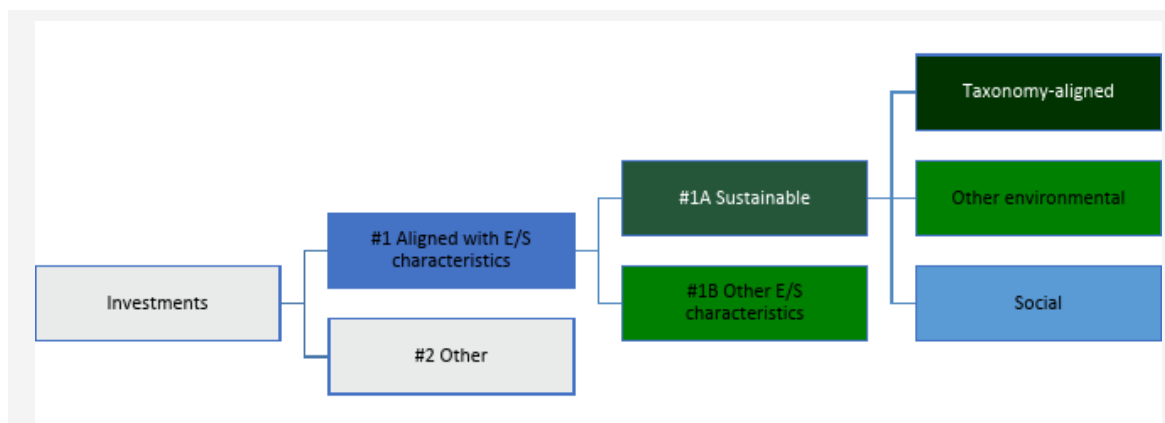
- the composition of the executive team and board of directors, including the experience, diversity and distribution of roles, along with succession planning and board evaluation
- executive remuneration, including short term and long term incentives and their alignment with investor interests
- risk control and reporting, including auditor independence and tenure
- shareholder rights, including one-share-one-vote and related-party transactions

What is the asset allocation planned for this financial product?

The fund is at least 90% aligned with E/S characteristics (#1 Aligned with E/S characteristics) and up to 10% invested in Other (#2 Other). At least 51% are allocated to Sustainable Investments (#1A Sustainable Investments) and the remainder will be invested in investments aligned with other environmental and/or social characteristics (#1B Other E/S characteristics).

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

Asset allocation describes the share of investments in specific assets.



#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.

• Sustainable investments are calculated on a pass/fail basis including labelled bonds (where relevant to the asset class), and securities from issuers with minimum 20% exposure (as measured by revenue, EBIT, enterprise value or similar metrics) to economic activities that contribute to environmental or social objectives.

• In the absence of an EU social taxonomy, Pictet has developed a proprietary social taxonomy framework. The framework is based on the Report on Social Taxonomy published by the EU Platform on Sustainable Finance in 2022. Eligible activities are defined as socially beneficial goods and services that substantially contribute to one of the following three social objectives: (1) inclusive and sustainable communities, (2) adequate living standards and well-being for end users and (3) decent work.

• EU Green taxonomy-aligned investments are calculated on a revenue-weighted basis (ie security weights are multiplied by the proportion of revenues from economic activities that contribute to relevant environmental objectives) and cannot be consolidated with other numbers following a pass/fail approach. Screening criteria are applied on a best effort basis to mitigate significant harm and uphold minimum social safeguards.

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

The fund does not use derivatives to attain the promoted environmental or social characteristics. However, exclusions are applied to all types of securities (equities, bonds, convertible bonds) issued by excluded entities, including participation notes and derivatives issued by third parties on such securities.



To what minimum extent are 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 Taxonomy¹?

☐ 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*

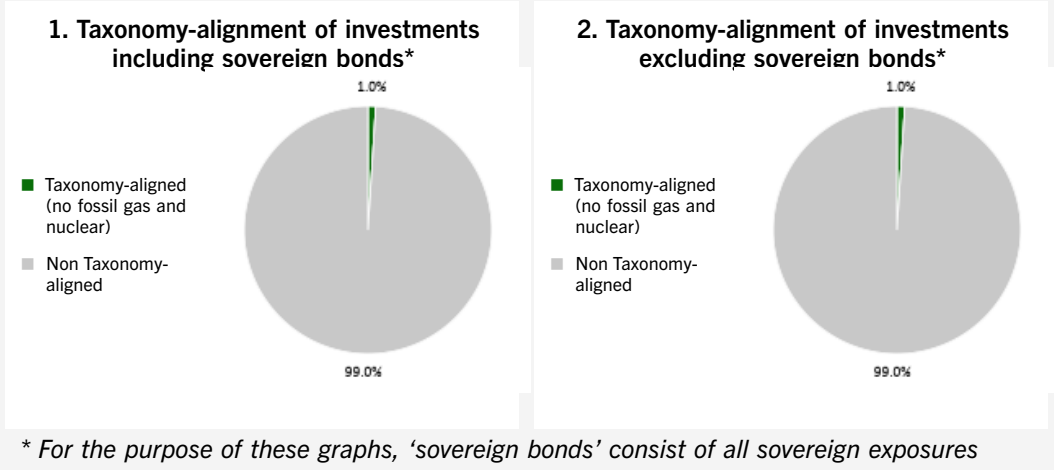
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies

¹ 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.

- 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.

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.



Note: EU Green taxonomy-aligned investments are calculated on a revenue-weighted basis (ie security weights are multiplied by the proportion of revenues from economic activities that contribute to relevant environmental objectives) and cannot be consolidated with other numbers following a pass/fail approach. Screening criteria are applied on a best effort basis to mitigate significant harm and uphold minimum social safeguards.

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

The minimum commitment of investments in transitional and enabling activities is 0% due to the lack of feasibility to make binding commitments.

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

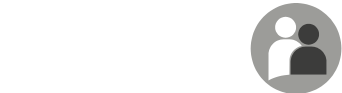
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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

The minimum share of sustainable investments with an environmental objective is 10%. The sum of investments with a social and environmental objective will be at least 51%.

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 minimum share of sustainable investments with a social objective is 20%. The sum of investments with a social and environmental objective will be at least 51%.



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

The fund’s “other” investments include cash positions, and derivatives. Where relevant, minimum environmental or social safeguards apply to the underlying securities.

► See also: “What investment strategy does this financial product follow?”.



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 index has been designated for the purpose of attaining the environmental or social characteristics promoted by the fund.

- **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:

<https://documents.am.pictet/?isin=LU0386859887&dla=en&cat=sfdr-permalink>

Pictet Asset Management's Responsible Investment policy:

https://documents.am.pictet/library/en/other?documentTypes=RI_POLICY&businessLine=PAM