

# 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 <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> 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 6<sup>1</sup> of 8<sup>2</sup> of 9 SFDR<sup>3</sup>.

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.

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

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

<sup>3</sup> 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)

Product name: **JPMorgan Funds - US Technology Fund**

Legal entity identifier: **5493007K3Z70ZR5WIM85**

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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



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

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

Through its inclusion criteria, the Sub-Fund promotes environmental characteristics which may include effective management of toxic emissions and waste, as well as good environmental record. It also promotes social characteristics which may include effective sustainability disclosures, positive scores on labour relations and management of safety issues.

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

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

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

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

The methodology is based on a company's management of relevant environmental or social issues such as its toxic emissions, waste management, labour relations and safety issues. To be included in the 51% of assets promoting environmental and/or social characteristics, a company must score in the top 80% relative to its peers on either its environmental score or social score and follow good governance practices.

To promote certain norms and values, the Investment Manager utilises data to measure a company's participation in activities potentially contrary to the Sub-Fund's exclusion policy such as companies manufacturing controversial weapons. The data may be obtained from investee companies themselves and/or supplied by third party service providers (including proxy data). Data inputs that are self-reported by companies or supplied by third-party providers may be based on data sets and assumptions that may be insufficient, of poor quality or contain biased information. Third party data providers are subject to rigorous vendor

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

selection criteria which may include analysis on data sources, coverage, timeliness, reliability and overall quality of the information, however, the Investment Manager cannot guarantee the accuracy or completeness of such data.

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

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

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

Contribution to such objectives is determined by either (i) products and services sustainability indicators which may include the percentage of revenue derived from providing products and / or services that contribute to the relevant sustainable objective, such as a company producing solar panels or clean energy technology that meets the Investment Manager’s proprietary thresholds contributing to climate risk mitigation. The current percentage of revenue is set at a minimum of 20% and the entire holding in the company /issuer is considered a Sustainable Investment; or (ii) being an operational peer group leader contributing to the relevant objective. Being a peer group leader is defined as scoring in the top 20% relative to peers based on certain operational sustainability indicators. For example, scoring in the top 20% relative to peers on total waste impact contributes to a transition to a circular economy.

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

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

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

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

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

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

The Investment Manager’s approach includes quantitative and qualitative aspects to take the indicators into account. It uses particular indicators for screening, seeking to exclude companies that may cause significant harm. It uses a subset for engagement seeking to influence best practice and it uses certain of them as indicators of positive sustainability performance, by applying a minimum threshold in respect of the indicator to qualify as a Sustainable Investment.

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

Screening

Certain of the indicators are taken into account through the values and norms-based screening to implement exclusions. These exclusions take into account indicators 10 and 14 in relation to UN Global Compact principles and OECD Guidelines for Multinational Enterprises and controversial weapons.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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

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

#### Engagement

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

#### Indicators of sustainability

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

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

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

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

The “do not significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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



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

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

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

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

☐ No



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

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

#### Investment approach

- Uses a fundamental, bottom-up stock selection process.
- Seeks to identify the best investment ideas in technology-driven sectors.

#### ESG approach: ESG Promote

- Excludes certain sectors, companies or practices based on specific values or norms based criteria.

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

- At least 51% of assets to be invested in companies with positive environmental and/ or social characteristics.
- At least 10% of assets to be invested in Sustainable Investments.
- All companies follow good governance practices.

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

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

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

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

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

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

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

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

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



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

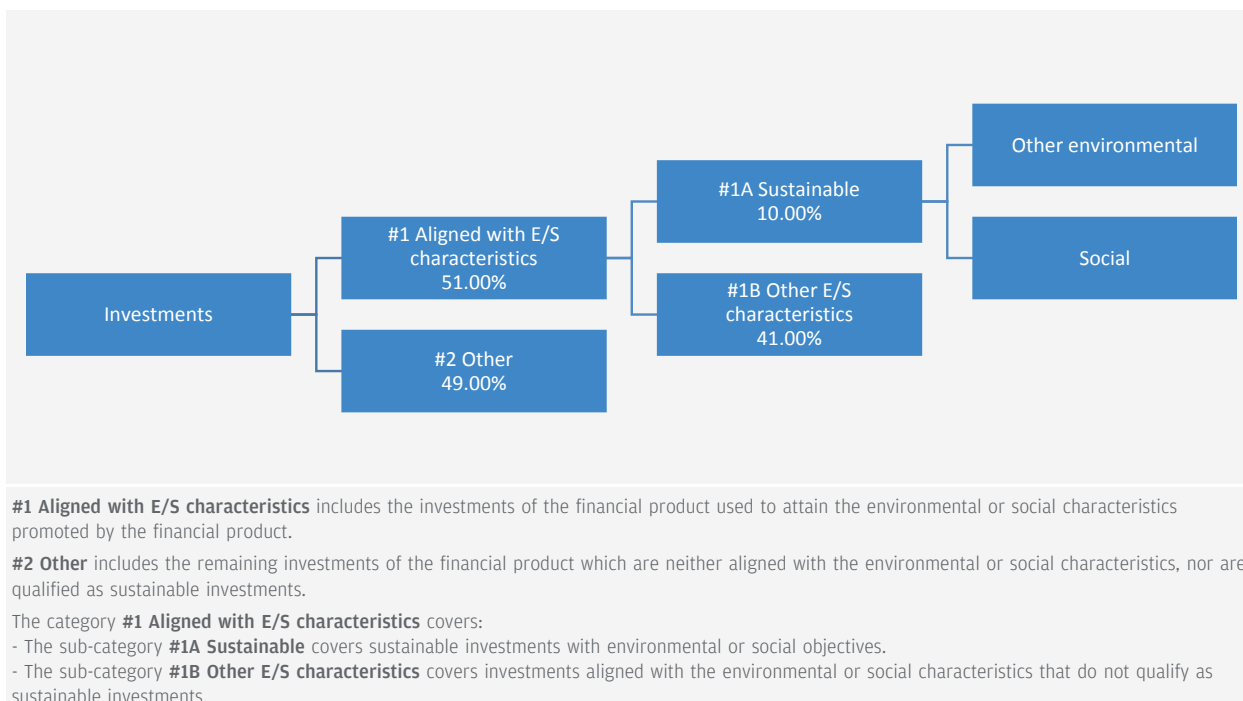
**Asset allocation**  
describes the share of investments in specific assets.

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.

The Sub-Fund plans to allocate at least 51% of its assets to companies with positive environmental and / or social characteristics and a minimum of 10% of assets to Sustainable Investments. The Sub-Fund does not commit to investing any proportion of assets specifically in companies exhibiting positive environmental characteristics or specifically in positive social characteristics or both nor is there any commitment to any specific individual or combination of environmental or social objectives in respect of the Sustainable Investments. Therefore, there are no specific minimum allocations to environmental or social objectives referred to in the diagram below.

Ancillary Liquid Assets, Deposits with Credit Institutions, money market instruments / funds (for managing cash subscriptions and redemptions as well as current and exceptional payments) and derivatives for EPM are not included in the % of assets set out in the table below. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.



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

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



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

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

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

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

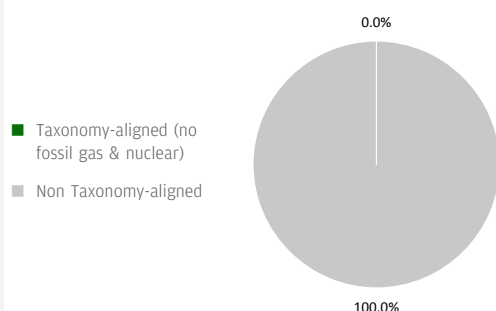
Not applicable

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

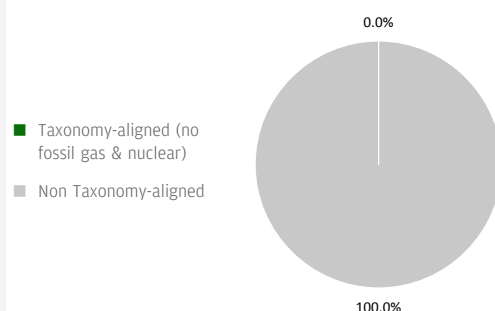
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for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

The two graphs below show in blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

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

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

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

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



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

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



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



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

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



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

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

Ancillary Liquid Assets, Deposits with Credit Institutions, money market instruments / funds (for managing cash subscriptions and redemptions as well as current and exceptional payments) and derivatives for EPM are not included in the % of assets included in the asset allocation diagram above, including under “other”. These holdings fluctuate depending on investment flows and are ancillary to the investment policy with minimal or no impact on investment operations.

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

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



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

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

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

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable



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

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