

3/ Pre-contractual disclosure template (Article 8 SFDR)

**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.

**Product name:**  
SSP / M – (ZAD) European Equity

**Legal entity identifier:**  
213800NWZVPKA7E8HZ45

**Environmental and/or social characteristics**

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

☒ Yes ☐ No

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : ____%	<input 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 ____% 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 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 type="checkbox"/> with a social objective
	<input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make sustainable investments</b>



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

The product promotes (i) environmental characteristics such as water withdrawal, water recycling, energy usage, percentage of renew-able energy use, total waste, total CO2 equivalent emissions or VOC emissions as well as (ii) social characteristics such as number and turnover of employees at the issuer, average training hours, average employee compensation, % women in workforce, % women in management or % minorities in workforce.

Investee companies contained in the portfolio of the Sub-Fund will be subject to a thorough assessment on the aforementioned environmental and social characteristics which on the basis of an internal scoring model developed by Zadig Asset Management SA (the **"Investment Manager"**) and Zadig Asset Management LLP (the **"Investment Advisor"**).

Data for the internal scoring model on the attainment of the aforementioned environmental and social characteristics at the level of the relevant investee companies are provided by MSCI which will be completed by the research and direct dialogue with the issuers by the Investment Manager and the Investment Advisor.

No reference benchmark is being used.

**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?**

The scoring model is built around the following four pillars:

- (1) Environment: Scoring based on data provided by MSCI;
- (2) Social: Scoring based on data provided by MSCI;
- (3) Governance: Scoring based on internal model of the Investment Manager completed by internal analysis and engagement; and
- (4) Controversies: Scoring based on data provided by MSCI.

The Investment Manager then applies different weights for each sector. For example, as industrial sectors have a higher weight for environment, the Investment Manager is focusing for service companies on social issues. The Investment Manager considers governance as a crucial component of any investment irrespective of the sector and therefore applies a constant 40% weight.

● **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?**

Not applicable.

● **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?**

Not applicable.

**Principal adverse impact** are the most significant negative impacts of investment decision 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

☒ No



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

To achieve its investment objective, the product will base its investments on fundamental research in the selection of Transferable Securities for long positions. It will benefit from proprietary valuation models for each of its individual investments and the strategy will be reviewed frequently in light of discussions it may have with the management of the issuers of the Transferable Securities in which the portfolio is invested or is contemplating to invest. The objective is to maintain a concentrated portfolio of equities across a range of European countries and sectors subject to the

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

investment restrictions set out in the prospectus.

● ***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?***

More than half of the portfolio of the Sub-Fund must be invested in securities from issuers having obtained a scoring in the internal model of the Investment Manager which is equal or higher than 5 whereby 10 is the highest score and 1 is the lowest score. For the avoidance of doubt, the internal scoring model is binding on the Investment Manager and the Investment Manager cannot overrule the scoring by factors or considerations not contained in the model. Under the in-ternal scoring model, securities are assessed on multiple environmental and social characteristics.

● ***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 assessment of Governance practices is a mix of:

(1) An objective and data-driven assessment, with a focus on minority shareholders rights, diversity, board structure and attendance as well as business ethics, anti-competitive practices, tax transparency, corruption and instability among other criteria. The Investment Manager and the Investment Advisor are relying on data from MSCI which are also scored in this regard.

(2) An experience-driven assessment of the governance standard where the Investment Manager with the support from the Investment Advisor is aiming to include their views on the management team and its track record, the quality of board members and the presence of large or majority shareholder and how these facts might influence the issuer's performance – in this context, the Investment Manager and the Investment Advisor are meeting with top management of issuers.

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



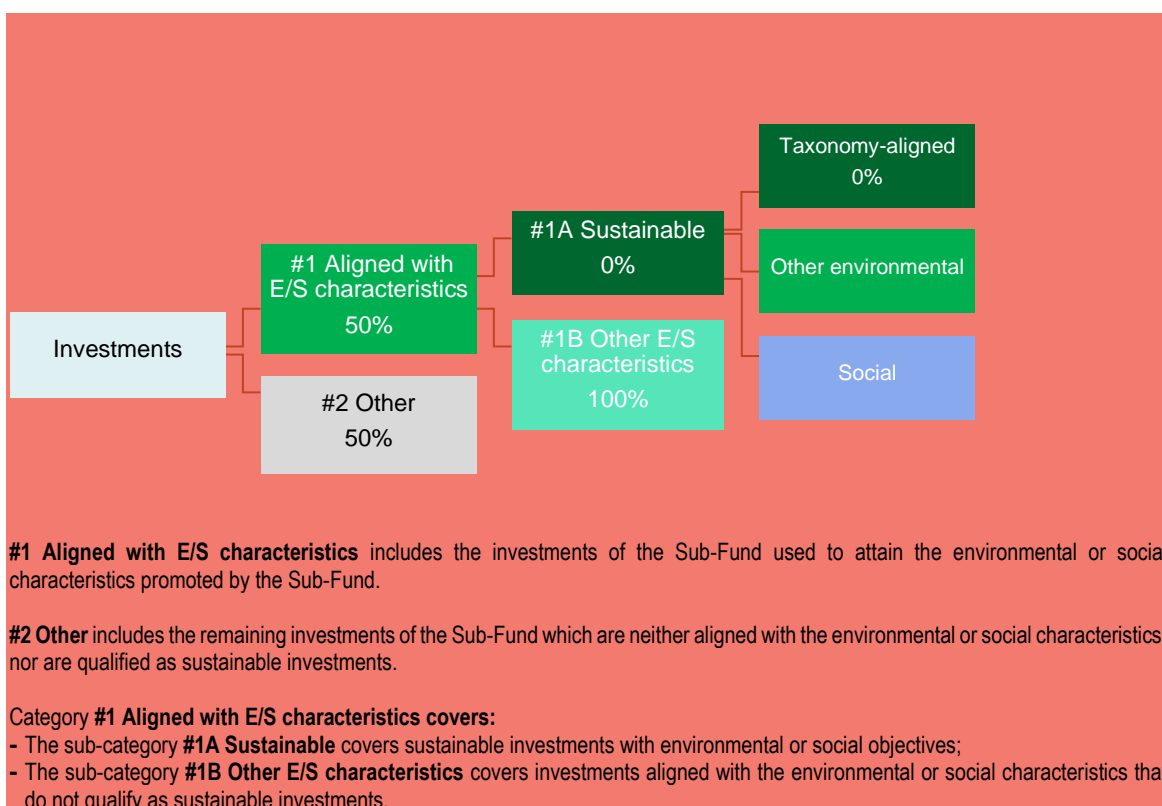
**Asset allocation** describes the share of investments in specific assets.

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

Under normal market conditions, more than half of the portfolio must be invested in securities from issuers having obtained a scoring in the internal model of the Investment Manager which is equal or higher than 5. Consequently, the portfolio will be invested in securities under “#1 Aligned with E/S characteristics” and used to attain the environmental or social characteristics promoted by at least 50%. There will be no sustainable investments. The remainder of the portfolio will consist of investments which fall into the category “#2 Other”.

**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.



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

The product will only use derivatives for hedging purposes and does not seek to promote environmental and social characteristics by using derivatives.



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

Not applicable.

● **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

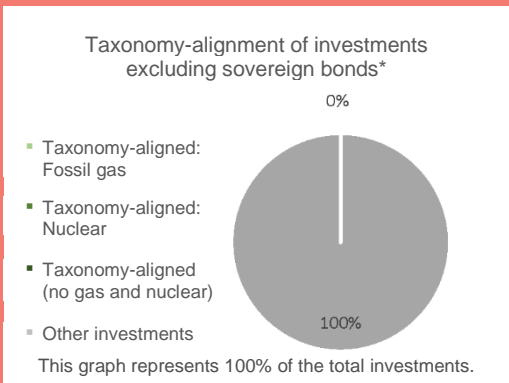
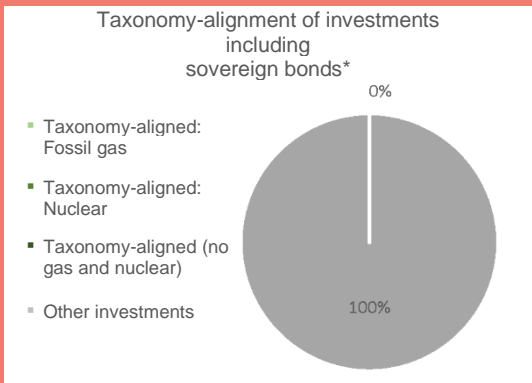
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for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

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

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

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

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



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

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

Not applicable.



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

Not applicable.



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

Not applicable.

Are environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



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

Investments under “#2 Other” can be (i) securities which have a scoring which is lower than 5 in the internal scoring model, (ii) financial derivative instruments used in the context of efficient portfolio management and (iii) liquidities used for cash management purpose. There are no minimum environmental or social safeguards.



**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?**

Not applicable.

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



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

<https://www.ofi-invest-lux.com/fund/ssp-m-zad-european-equity-class-o-c-eur/LU0754678422>