GENERALI INVESTMENTS

Article 10 (SFDR – Level II)

Website disclosure for an article 8 fund

GENERALI INVESTMENT SICAV – SRI AGEING POPULATION

IMPORTANT INFORMATION: The information contained in this webpage is based on the requirements for the website product disclosure for financial products that promote environmental or social characteristics (hereinafter, referred to " **Article 10 – Website disclosure**") of the SFDR Regulation & the Commission Delegated Regulation (EU) of 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter, referred to as "**SFDR Level 2 RTS**"). The information presented does **not** constitute a ***marketing communication*** or, an ***offer***, ***recommendation*** or ***solicitation*** to invest in the presented product and it **should not be read on its own but jointly with the offering documentation** of the relevant fund/sub-fund.

A. SUMMARY

Please refer to the summary document available on the website.

B. NO SUSTAINABLE INVESTMENT OBJECTIVE

The Sub-fund will partially make sustainable investments with a social objective, based on at least one of the following criteria:

- On the societal side: investments with a Societal Contribution of products and services above or equal to +30%. The Societal Contribution metric combines the positive and negative societal contributions of a company's products and services. The methodology draws on the societal aspects of the United Nations' 17 SDGs and their 169 sub-goals (or targets). Companies associated with a Societal Contribution above or equal to the selected threshold therefore make a significant contribution to one or several of these SDGs or targets.
- On the human capital side, two metrics both addressing SDG 8, as well as SDGs 3, 4, 5 and 10:
    - Investments with a Good Jobs Rating, based on the Investment Manager's internal methodology[1], above or equal to 55/100. The Good Jobs Rating is a quantitative metric designed to assess – on a scale of 0 to 100 – a company's overall ability to create durable and quality jobs for all, and particularly in areas (regions or countries) where employment is relatively scarce and therefore needed to ensure sustainable and inclusive economic growth.
    - Investments with a Happy@Work[2] Environment rating, based on the Investment Manager's internal methodology, above or equal to 4.5/5. The analysis framework provides a complete and objective assessment of the level of well-being at work, focusing on: purpose, autonomy, competence, working relations, and fairness.
    - Companies associated with a Good Jobs Rating or a Happy@Work Environment rating above or equal to the selected thresholds therefore make a significant contribution to SDG 8.

The Sub-fund does not invest in any company involved in activities identified in the Investment Manager's Socially Responsible Investment Policy (SRI) exclusion policy for their controversial social or environmental impacts, in companies affected by a level 3/3 controversy and in companies with a SPICE (i.e. Suppliers&Society, People, Investors, Clients and Environment) rating equal or less than 3/5.

Four layers are implemented to avoid occurrence of significant harm to any environmental or social sustainable investment objective, on an ex-ante basis, prior to any investment-decision. Indeed, investments targeted by one or more of the criteria below will not be considered as a sustainable investment:

1. As per the Investment Manager's SRI exclusion policy: activities are excluded for their controversial social or environmental impacts, as defined in Sycomore AM's core policy (applicable to all Sycomore AM's direct investments), and in the SRI policy (applicable to all open-ended UCITs, mandates and dedicated funds managed according to an SRI strategy).
2. Companies affected by a level 3/3 controversy: such companies are considered in violation of one of the principles of the United Nations' Global Compact.

[1] More information can be found on https://gipcdp.generali-cloud.net/static/documents/GIS_SRI_Ageing_Population_Art10_Website_disclosures_EN.pdf
[2] More information can be found on https://gipcdp.generali-cloud.net/static/documents/GIS_SRI_Ageing_Population_Art10_Website_disclosures_EN.pdf

3. SPICE rating below 3/5: The SPICE methodology, through its 90 criteria, covers all environmental, social and governance issues targeted by the indicators for adverse impacts on sustainability factors listed within the draft Regulatory Technical Standards. A lower rating, below 3/5, indicates a lower sustainability performance on one or more adverse impacts; and,
4. As per Sycomore AM's Principle Adverse Impact (PAI) policy: a PAI policy applied to identify further potential significant harm across environmental and social matters targeted by the PAI indicators listed in Table 1 of Annex I is implemented. Companies meeting any exclusion criterion regarding GHG emissions, biodiversity, water, waste, gender equality, UN Global Compact principles/OECD Guidelines for Multinational Enterprises compliance, or controversial weapons, will be reported as "not sustainable".

Upon meeting the criteria required to be considered as "sustainable" as described under this and the following sections, the investment in a company is considered as included in the sustainable investments portion of the portfolio.

Adverse impacts on sustainability factors involve indicators at two levels:

1. For sustainable investments only: a PAI policy directly drawing from indicators of Table 1 of Annex I and any relevant indicators in Tables 2 and 3.
2. For all investments of the financial product invested exclusively in equities of listed : the SPICE analysis framework, going through all issues targeted by all adverse sustainability indicators, with ability to use them to feed the analysis.

PAI policy: each sustainability factor targeted by Table 1 of Annex I was associated with an exclusion criterion**:**

Applicable to investee companies

GHG emissions:

- Indicators #1-2-3-5-6 (GHG emissions scope 1, 2, 3, and total emissions; Carbon footprint; GHG intensity of investee companies ; Share of non-renewable energy consumption and production; Energy consumption intensity per high impact climate sector): for all sectors, GHG emissions are assessed adjusting for company size, relative to their sub-sector, and taking into account science-based decarbonization levels required to keep global temperature increase below 2°C compared to preindustrial temperatures, as described in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC). As a consequence, Sycomore AM's PAI approach to GHG emissions for all sectors relies on science-based target metrics: from the science-based target initiative (SBTi) on the one hand, and on the temperatures computed by the Science-Based 2°C Alignment (SB2A) initiative on the other hand. Companies associated with a temperature exceeding the threshold set in the PAI policy are deemed to significantly harm the climate change mitigation objective.
- Indicator #4 (exposure to companies active in the fossil fuel sector): companies active in the fossil fuel sector are addressed by Sycomore AM's exclusion policy.

Biodiversity:

- Indicator #7 (Activities negatively affecting biodiversity-sensitive areas), complemented by indicator #14 of Table 2 (Natural species and protected areas): these two indicators send a signal that activities in biodiversity-sensitive areas without appropriate mitigation measures might occur. Companies for which this is confirmed are deemed to significantly harm the objective of protection and restoration of biodiversity and ecosystems. The detailed process for confirming excluded companies is provided in the PAI policy.

Water:

- Indicator #8 (Emissions to water): for companies reporting emissions exceeding the threshold set in the PAI policy, further investigation is made on the impact on stakeholders of past emissions, based on controversy reviews. A severe impact not yet fully addressed by the company is deemed to significantly harm the objective of sustainable use and protection of water and marine resources.

Waste:

- Indicator #9 (Hazardous waste and radioactive waste ratio): for companies reporting quantities exceeding the threshold set in the PAI policy, further investigation is made on the impact on stakeholders of waste generated, based on controversy reviews. A severe impact not yet fully addressed by the company is deemed to significantly harm the objective of pollution prevention and control.

UN Global Compact principles/OECD Guidelines for Multinational Enterprises compliance:

- Indicator #10 (Violations): The aforementioned controversy analysis framework implemented by Sycomore AM precisely aims at identifying violations of these international standards.
- Indicator #11 (Lack of processes and compliance mechanism to monitor compliance): lack of processes and compliance mechanism to monitor compliance with these international standards is a signal that further due diligence is necessary to conclude on the likeliness of potential violations. More stringent requirements throughout the SPICE analysis, in particular related to Society (S), People (P) and Clients (C) stakeholders, defined in the PAI policy, are then implemented. Any company failing the test will be deemed to significantly harm one or more social objectives.

Gender equality:

- Indicator #12 (Unadjusted gender pay gap): Companies associated with an unadjusted gender pay gap exceeding the threshold set in the PAI policy are deemed to significantly harm the social objective of tackling inequality.
- Indicator #13 (Board gender diversity): Companies associated with a share of women seating on the company's Board below the threshold set in the PAI policy are deemed to significantly harm the social objective of tackling inequality.

Controversial weapons:

- Indicator #14 (Exposure to controversial weapons): Companies involved in the manufacture or selling of controversial weapons are specifically addressed by Sycomore AM's exclusion policy.

Applicable to sovereigns and supranationals

- GHG intensity (indicator #15): GHG intensity is part of the analysis of sovereigns, described in Sycomore AM's ESG integration policy, that allows to exclude low performers across a range of environmental, social and governance matters.
- Investee countries subject to social violations (indicator #16): similarly, the analysis framework applicable to sovereigns addresses adherence to the Charter of the United Nations. In addition, a set of indicators allows to assess government practices in terms of sustainable development and governance, including in particular corruption, human rights and social inclusion.

SPICE rating

The SPICE methodology, through its 90 criteria, covers all environmental, social and governance issues targeted by the indicators for adverse impacts on sustainability factors listed within Annex I of the Commission Delegated Regulation (EU) 2022/1288.

The Sub-fund invests exclusively in equities of listed companies. Out of the 46 adverse impact indicators applicable to investee companies – excluding one non-mandatory indicator dedicated to Green securities investments (14 principal adverse impact indicators listed in Table 1, as well as 32 additional adverse impact indicators listed in Table 2 and Table 3), 42 indicators (23 environmental indicators and 19 social indicators) are covered during SPICE analysis, and 4 indicators (1 environmental indicator and 3 social indicators) relate to adverse impacts targeted by Sycomore AM's exclusion policy.

More specifically, Sycomore AM's fundamental analysis model SPICE, is an integrated model, allowing to get a holistic view of companies of the investment universe. It was built taking into account the Organisation for Economic Cooperation and Development ("OECD") guidelines for Multinational Enterprises. It fully integrates ESG factors to capture how companies are managing adverse impacts as well as key sustainable opportunities following a double materiality approach.

Exclusion policy

Finally, Sycomore AM's exclusion policy targets adverse sustainability impact indicators including controversial weapons, exposure to fossil fuel sector, chemical pesticide production, and more broadly was drafted to target companies in breach of the UN Global Compact ("UNGC") principles and OECD Guidelines for Multinational Enterprises.

Once the analysis – SPICE analysis including review of controversies, exclusion policy compliance – is performed, it impacts investment decisions in the following ways:

- As indicated in the previous question, it provides a safeguard against significant harm to any sustainable investment objective, by excluding companies not meeting minimum safeguard requirements, i.e., a company attaining a SPICE overall rating equal to or less than 3/5 is excluded, or a company exposed to any economic activity mentioned in Sycomore AM's exclusion policy.
- It also impacts the financial investment case in two ways: 1. assumptions related to the company's prospects (growth and profitability forecasts, liabilities, M&A, etc.) can be fed by certain SPICE outputs as relevant, and 2. some core assumptions of valuation models are systematically linked to SPICE outputs.

The development of Sycomore AM's analysis framework "SPICE" as well as the exclusion policy have been inspired by the OECD's Guidelines for multinational companies, the UNGC principles, the International Labour Organization's international standards and the UN Guiding Principles on Business and Human Rights. To assess the fundamental value of a company, analysts systematically examine how a firm interacts with its stakeholders. This fundamental analysis is designed to understand strategic challenges, business models, management quality and degree of involvement, and the risks and opportunities faced by the company. Sycomore AM has also defined its Human Rights Policy in compliance with the UN Guiding Principles on Business and Human Rights.

C. ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Sub-fund promotes environmental and social characteristics pursuant to Article 8 of the Regulation (EU) 2019/2088 by investing, with a SRI process, in listed equities from European companies that demonstrate superior ESG performance based on the Investment Manager's proprietary methodology and a positive Societal Contribution of its products and services.

In addition, the Investment Manager aims at analysing the portfolio's exposure and/or contribution to the United Nations Sustainable Development Goals ("SDGs") and to have an overall better result at a Sub-fund Level compared to the MSCI Europe – Net Total Return Index, the Sub-fund's ("Benchmark") on certain environmental and governance pillars. Furthermore, the Sub-fund commits to partially make sustainable investments in companies that offer solutions for ageing societies through their products and services. Those companies contribute to the social objectives linked to the long-term trend of aging population, those social objectives being: Health, Ageing Well, Better Living and Social solutions to the challenges of an ageing world.

D. INVESTMENT STRATEGY

The Sub-fund shall invest at least 90% of its net assets in listed equities issued by European companies compliant with the SRI process.

Negative screening or "exclusions"

The Investment Manager's exclusion policy

The Investment Manager excludes companies involved in activities identified in the Investment Manager's SRI exclusion policy for their controversial social or environmental impacts. Those activities restricted for their controversial social or environmental impacts, as defined and revised annually in Sycomore AM's core policy (applicable to all Sycomore AM's direct investments), and in the Socially Responsible Investment Policy (applicable to all open-ended UCITs, mandates and dedicated funds managed according to an SRI strategy) such as violation violations of fundamental rights, controversial and nuclear weapons, conventional weapons and ammunitions, thermal coal, tobacco, pesticides, pornography, carbon-intensive energy generation, oil & gas.

SPICE rating

ESG analysis, being simultaneously and fully integrated into the investment process, is conducted through the Investment Manager (Sycomore Asset Management)'s proprietary "SPICE" methodology. SPICE is the acronym for the Investment Manager's extra-financial methodology. It aims in particular to understand the distribution of the value created by a company between all its stakeholders (society and suppliers, people – i.e. employees, investors, clients and environment), the Investment Manager's conviction being that an equitable sharing of the value between its stakeholders is determinant to ensure its sustainable growth.

This methodology leads to a SPICE rating from 1 to 5 (5 being the highest rate). The SPICE analysis covers at least 90% of the net assets of the Sub-fund (excluding government bonds and cash) and is applied on an ongoing basis. The Investment Manager excludes companies that attain an overall SPICE rating equal to or less than 3/5. Companies which are rated less than 3/5 in the Clients pillar of SPICE are also excluded. A particular attention is paid to the analysis of this dimension as the Sub-fund invests in companies offering products and solutions potentially to senior customers who might be considered more fragile.

Controversy Rating

The Investment Manager carries out a full monitoring of the controversies impacting the companies based on several sources of external data. The controversies are integrated to the Investment Manager's analysis tool and matched with the SPICE criteria. Each controversy is assigned a rating from 0 to 3 based on the severity, type and status of the controversy, and on the company's attitude and reaction to the event. The Investment Manager excludes companies that affected by a level 3/3 controversy.

Positive screening

At least 90% of the net assets of the Sub-fund (excluding government bonds and cash) is invested in companies with a Societal Contribution of products and services strictly above 0%.

The eligible investment universe of the Sub-fund is built according to specific criteria into the overall SPICE methodology as explained in the "SPICE rating" point of this section.

Monitoring exposure and/or contribution to SDGs

The SPICE methodology also contributes to analysing a company's exposure and/or contribution to the United Nations SDGs:

- Within the People pillar, the approach to evaluating human capital in the company refers explicitly to SDGs 3, 4, 5, 8 and 10 on social issues such as health, lifelong learning, gender equality, full employment, decent work and reducing inequality.
- Within the Society & Suppliers pillar, the assessment of the societal contribution is based on the analysis of positive and negative contributions from business activities under 4 pillars (access and inclusion, health and security, economic and human progress and employment) and refers explicitly to SDGs 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.
- Within the Environment pillar, the assessment of the net environmental contribution (NEC) analyses the positive and negative impacts of companies and their products and services on 5 issues (climate,

biodiversity, water, waste/resources and air quality) directly related to environmental SDGs 2, 6, 7, 9, 11, 12, 13, 14 and 15.

The Sub-fund also undertakes to report annually on the portfolio companies' exposure to SDGs through their products and services.

Environmental and governance performance against the Benchmark

In the framework of the SRI label, the Investment Manager aims at having an overall better result at a Sub-fund level compared to the Sub-fund’s Benchmark on the two following factors:

- On the environment pillar: Net Environmental Contribution (NEC).
- On the governance pillar: percentage of women in key management roles.

The binding elements are the application of the negative screening, the positive screening, and the enhanced environmental and governance performance against the Benchmark, and include the following:

- Excluding investments in companies exposed to economic activities set out under the Investment Manager’s SRI exclusion policy.
- Excluding investment in companies that attain an overall SPICE rating equal to or less than 3/5.
- Excluding investment in companies that attain a Clients pillar of SPICE rating equal to or less than 3/5.
- Excluding investments in companies affected by a level 3/3 controversy.
- At least 90% of the net assets of the Sub-fund (excluding government bonds and cash) is invested in companies with a Societal Contribution of products and services strictly above 0%.
- An overall better result at a Sub-fund level compared to the Benchmark on the Net Environmental Contribution (NEC) and the percentage of women in key management roles indicators.

Compliance to the above filters is to be met by all investments excluding (i) Ancillary Liquid Assets in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets or for a period of time strictly necessary in case of unfavourable market conditions, and (ii) cash equivalents (i.e., bank deposits, Money Market Instruments, money market fund), pursuant to the Sub-fund Investment Policy, and (iii) government bonds, corporate bonds, convertibles and participation rights, that are not subject to the SRI process) of the Sub-fund following the E/S characteristics promoted by the Sub-fund.

In addition, the Sub-fund commits to the following binding element:

- At least 50% of the net assets of the Sub-fund is invested in companies that contribute to a social objective and shall attain a Societal Contribution of products and services above or equal to 30%, or a Good Jobs Rating above or equal to 55/100, or a Happy@Work Environment rating above or equal to 4.5/5.

Following the application of the investment strategy, the Sub-fund’s eligible investment universe is reduced by at least 20% compared to its initial investment universe, namely listed equities issued by European companies.

Governance is part of the SPICE analysis, including a dedicated governance section within the Investors “I” section involving a significant focus on management structures, and governance items embedded into the other parts of the analysis framework, notably employee relations and remuneration of staff within the People “P” section, and tax practices within the Society & Suppliers “S” section. Overall governance of issues associated with each type of stakeholder (Society, People, Investors, Clients and the Environment) is addressed in each according section.

Further requirements to exclude from the investable universe insufficient governance practices from the “G” section, associated with a minimum threshold, can be found in Sycomore AM’s exclusion policy.

E. PROPORTION OF INVESTMENTS

Under normal market conditions, a minimum of 90% of the Sub-fund's net assets will be invested in equity securities that qualify as aligned with E/S characteristics (#1 Aligned with E/S characteristics). Furthermore, a minimum of 50% of the Sub-fund's net assets will be invested in sustainable investments with social objective. The remaining 10% of the Sub-fund's net assets will be invested in other instruments as further described below.

The Sub-fund will make at least 50% of investments in socially sustainable investments.

The "other" investments and/or holdings of the Sub-fund are comprised, directly or indirectly, of securities whose issuers are not subject to the SRI process described above considering those investments and/or holdings are not part of the core investments of the Sub-fund.

The #2 Other non-core investments include (i) Ancillary Liquid Assets in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets or for a period of time strictly necessary in case of unfavourable market conditions, and (ii) cash equivalents (i.e., bank deposits, Money Market Instruments, money market fund), pursuant to the Sub-fund Investment Policy, and (ii) government bonds, corporate bonds, convertibles and participation rights, UCITS or UCIs compliant with the provisions set out in Article 41 (1) e) of the UCI Law.

There are minimum environmental and social safeguards in respect of the (i) government bonds, corporate bonds, convertibles and participation rights, considering in-house ESG filters still applies and/or (ii) UCITS, UCIs Money Market Instruments, money market fund considering French SRI certification or equivalent in a member State of the European Union is required.

No minimum environmental or social safeguards are applied to the remaining "other" investments and/or holdings.

The use of derivative financial instruments is limited to techniques that do not alter the ESG selection policy significantly or over the long term.

The underlying of derivatives are subject to the SRI process described above in the investment policy. The use of the derivatives must be compliant and consistent with the Sub-fund's long-term objectives. The use of the derivatives cannot lead to significantly or lastingly distort the ESG process. The Sub-fund may not hold a short position via derivatives in a stock selected through the ESG selection process.

F. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

Sycomore AM's investment managers are responsible for the monitoring of environmental or social characteristics of the funds, using all data and methodologies in use at Sycomore AM with the assistance of ESG research personal and subject to first and second levels of controls in order to ensure a proper execution of the investment strategies in compliance with ESG constraints proper to each fund.

The fund uses the Investment manager's proprietary "SPICE" methodology as an indicator to measure the overall sustainable performance of the investments of the fund. The SPICE rating ranges from 1 to 5 (5 being the highest rate) and covers at least 90% of the net assets of the fund (excluding UCIs, debt securities and cash). It is updated in an ongoing basis thanks to daily watch on news flows and a complete review is performed every two years.

G. METHODOLOGIES

The sustainability indicators used to measure the attainment of the social characteristics promoted by the Sub-fund are:

- The investee companies' overall SPICE[3] rating, based on the Investment Manager's internal methodology. SPICE assesses the sustainable performance of companies. It integrates the analysis of economic, governance, environmental, social and societal risks and opportunities in business practices and in the products and services offering of companies. The analysis takes into account 90 criteria from which a score between 1 to 5 per letter of SPICE is obtained. These 5 scores are weighted according to the company's most material impacts.
- The investee companies' overall Controversy Rating (as described above).
- The investee companies' Societal Contribution of products and services. The Societal Contribution[4] is a quantitative metric, on a scale of -100% to +100%, which combines the positive and negative societal contributions of a company's products and services. The methodology draws on the societal aspects of the United Nations' 17 Sustainable Development Goals (SDGs) and their 169 sub-goals (or targets), which provide a shared roadmap for private and public sector players for 2030, designed to create a better and more sustainable future. The methodology also includes macroeconomic and scientific data sourced from public research institutions, and from independent organizations such as the Access to Medicine Foundation or the Access to Nutrition Initiative.
- The Sub-fund's Societal Contribution of products and services compared to that of the Benchmark.
- The Sub-fund's overall percentage of women in key management roles compared to that of the Benchmark.
- The minimum percentage of the Sub-fund's investments allocated to socially sustainable investments.
- The share of securities within the portfolio with exposure to economic activities set out in the Investment Manager's SRI exclusion policy (as described above).

H. DATA SOURCES AND PROCESSING

The ESG analysis is conducted on the basis of a SPICE model by the analyst-fund managers, who draw primarily on data published by the companies themselves and on meetings with their directors. On-site visits also play a very important part in the research process. Active monitoring of the daily and specialist press, in NGO reports or though expert networks such as Thirdbridge or GLG, also provides valuable input for the analysis effort. As far as external research is concerned, services of specialist ESG brokers as well as MSCI controversy analysis are used and turnover reviews conducted by MSCI and Trucost to manage exclusions. ISS, the proxy voting advisory firm also helps with the execution of votes at shareholders' meetings, in keeping with the voting policy. ESG data in use at Sycomore AM comes from both internal and external resources, all aggregated in in-house ESG scoring

[3] More information can be found on https://gipcdp.generali-cloud.net/static/documents/GIS_SRI_Ageing_Population_Art10_Website_disclosures_EN.pdf

[4] More information can be found on https://gipcdp.generali-cloud.net/static/documents/GIS_SRI_Ageing_Population_Art10_Website_disclosures_EN.pdf

methodology “SPICE”. External sources in use can be but are not limited to: MSCI, Moody’s ESG, Iceberg Dara Lab, and S&P Trucost.

On a case-by-case basis, external reviews are also requested: the environmental impact metric – the Net Environmental Contribution (NEC) - was developed in partnership with Care & Consult and Quantis; the sub-fund also worked with The Good Economy on the development of the employment impact metric.

I. LIMITATIONS TO METHODOLOGIES AND DATA

The main methodological limits are:

- The availability of data to conduct ESG analysis.
- The quality of the data used in the assessment of ESG quality, as there are no universal standards related to ESG information and third party verification is not systematic.
- The comparability of data, as not all companies publish the same indicators.
- The use of proprietary methodologies, which relies on the experience and skills of the asset manager’s staff.

Methodologies implemented by Sycomore AM are based on a qualitative and quantitative analysis of companies’ ESG data. ESG data, whether sourced from external and/or internal sources is by nature subject to experience and skills of Sycomore AM’s analysts. Despite robust methodological frameworks, a part of subjectivity and discretion remains in the interpretation and use of ESG data. However, ESG information from third parties data may be incomplete, incorrect or unavailable. ESG data providers are private companies that provide ESG data for a variety of issuers. They may therefore change the valuation of issuers or instruments at their discretion. The ESG approach may evolve over time, due to the refinement of investment decision making processes to reflect ESG factors and risks, and/or due to legal and regulatory developments. Finally, the application of ESG criteria to the investment process may exclude securities from certain issuers for non-financial reasons and, as a result, may result in the loss of certain available market opportunities for funds that do not use ESG or sustainability criteria.

J. DUE DILIGENCE

100% of the funds’ assets are assessed for ESG rating, excluding cash at sight and derivatives, through in-house ESG analysis and ESG scoring methodology “SPICE”, mutual funds being subject to specific ESG due diligences.

K. ENGAGEMENT POLICIES

Sycomore AM operates voting and engagement policies that are about encouraging companies to improve their sustainability practices over the long term by suggesting areas for improvement as part of a constructive dialogue and long-term monitoring process. Shareholder engagement is a key feature of the role as responsible investors seeking to generate impacts, with a view to developing more sustainable business models able to meet today’s societal and environmental challenges.

L. REFERENCE BENCHMARK

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