

Sustainability-related website disclosures for iMGP DBi Managed Futures ex-Commodities Fund (the “Fund”)

This document provides you with sustainability-related information available on our website about this Fund in accordance with article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 and article 23 et seq. of Commission Delegated Regulation (EU) 2022/1288.

1. Summary

The environmental, social and governance (ESG) characteristics promoted by this Fund consist of investing in companies that have a reduced or negligible ESG risk and a good ESG Quality Score while excluding certain companies and sectors because they are not compatible with the Sub-Manager’s view on sustainable development. No reference benchmark has been designated to attain the environmental and social characteristics promoted.

According to the ESG policy, each invested security in the non-derivatives portfolio will be subject to a thorough assessment based on a variety of ESG factors provided by external sources and possibly complemented by the Sub-Manager internal research.

Regarding government issuers, the methodology which is used relies on UN SDGs alignment through a score from 0 to 100. The portfolio securities score (excluding financial derivative instruments) should be higher than the average of the relevant issuers’ universe.

The Fund has also adopted an exclusion policy whereby certain companies or securities with negative social or environmental impact are excluded from the investment universe of the Fund.

The Fund considers the below principal adverse impacts (PAI) of its investments: exposure to companies active in the fossil fuel sector and exposure to controversial weapons.

The investments of the Fund used to attain the abovementioned ESG characteristics will represent minimum 50% of the Fund’s investments. This excludes cash, money market instruments or similar instruments as well as derivatives.

The Sub-Manager will rely on data provided by world rating agencies and/or its own internal review process.

Due to missing well-defined standards and to the existence of different approaches towards sustainable practices, ESG data is intrinsically based on a qualitative and discretionary assessment, who may cause the data to be inaccurate. Elements of subjectivity are part of the collection and interpretation of ESG data and this could contribute to making the comparison between ESG integrated strategies difficult. Investors should be aware of the fact that evaluation they may do on some types of ESG factors may be consistently different from the approach selected by the Sub-Manager. In addition, ESG data for some of the issuers may be incomplete or unavailable. As a consequence, there may be instances where the Sub-Manager may need to rely on estimated data sourced from third-party data providers. This may differ from actual data that is subsequently published by the investee company.

As this Fund implements its strategy using financial derivative instruments, an engagement or stewardship policy is not deemed appropriate by the Sub-Manager.

The relevant actions to meet the environmental and/or social characteristics of the Fund will rather rely on the ESG integration process described above.

2. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

3. Environmental or social characteristics of the financial product

The environmental, social and governance (ESG) characteristics promoted by this Fund consist of investing in companies that have a reduced or negligible ESG risk and a good ESG Quality Score while excluding certain companies and sectors because not compatible with the Sub-Manager's view on sustainable development. No reference benchmark has been designated to attain the environmental and social characteristics promoted.

4. Investment strategy

The Sub-Manager believes that responsible investment practices incorporating an assessment of ESG factors adds sustainable value for the Fund by mitigating risk and positively influencing long-term financial performance, consistent with its fiduciary duty.

As the Fund implements its strategy using financial derivative instruments, the non-derivatives portfolio consists mainly of high-quality debt issues, cash or time deposits, money market instruments and money market funds (the latest to be included in the 10% limit in UCITS and/or other UCI).

Each invested security in the non-derivatives portfolio will be subject to a thorough assessment based on a variety of ESG factors provided by external sources and possibly complemented by the Sub- Manager internal research.

Regarding government issuers, the methodology which is used relies on UN SDGs alignment through a score from 0 to 100. The portfolio securities score (excluding financial derivative instruments) should be higher than the average of the relevant issuers' universe.

5. Proportion of investments

The investments of the Fund used to attain the abovementioned ESG characteristics will represent minimum 50% of the Fund's investments. This excludes cash, deposits or similar instruments as well as derivatives, including FX derivatives for share class hedging purpose. Positions in derivatives are used to approximate the returns that managed futures alternative funds would typically achieve.

6. Monitoring of environmental or social characteristics

Each invested security in the non-derivatives portfolio will be subject to a thorough assessment based on a variety of ESG factors provided by external sources and possibly complemented by Sub-Manager internal research.

Regarding government issuers, the methodology which is used relies on UN Sustainable Development Goals (SDGs) alignment through a score from 0 to 100. The portfolio securities score (excluding financial derivative instruments) should be higher than the average of the relevant issuers' universe.

All Countries are ranked by their overall score. The overall score measures the total progress towards achieving all 17 SDGs. Sustainable Development Report helps to study and consider how countries are managing issues such as No poverty, Gender Equality and Life on land.

In particular, the 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals, which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognize that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth - all while tackling climate change and working to preserve our oceans and forests.

The Sub-Manager only considers Government issuers above 70 according to the ranking of the UN SDG.

7. Methodologies

The Sub-Manager considers material ESG factors within its fundamental research process, leveraging external ESG data and in-house qualitative assessment to identify potential material risk factors.

As part of the Sub-Manager's assessment of potential investment opportunities for the Fund, the Sub-Manager is committed to excluding certain issuers with negative social or environmental impact. For example, the following companies or securities shall be excluded from the Sub-Manager selection:

1-Companies or bonds issued by countries that are assessed to be non-compliant with the United Nations Global Compact Principles

2-Companies or bonds issued by countries which have a low rating or are subject to severe ESG controversies depending on data provided by external providers or Sub-Manager internal research

3-Companies that derive more than 25% of their revenues from thermal coal extraction unless a transition plan towards renewable energy is in place and no other breach within Norms, Environment, Social or Governance is observed.

4-Companies identified as producing controversial weapons

5-Exposure to commodities by means of eligible indices and transferable securities including through derivatives.

The Sub-Manager screens potential investments to identify and exclude issues with known instances of corruption, as well as transparency, ethics, or other human rights violations that significantly harm society.

The Fund considers the below PAI of its investments: exposure to companies active in the fossil fuel sector and exposure to controversial weapons.

8. Data sources and processing

The Sub-Manager will rely on external sources which will be complemented by internal research. Regarding government issuers, the methodology which is used relies on UN SDGs alignment through a score from 0 to 100.

Use of estimated data may vary depending on the specific case.

9. Limitations to methodologies and data

Due to missing well-defined standards and to the existence of different approaches towards sustainable practices, ESG data is intrinsically based on a qualitative and discretionary assessment, who may cause the data to be inaccurate. Elements of subjectivity are part of the collection and interpretation of ESG data and this could contribute to making the comparison between ESG integrated strategies difficult. Investors should be aware of the fact that evaluation they may do on some types of ESG factors may be consistently different from the approach selected by the Sub-Manager. In addition, ESG data for some of the issuers may be incomplete or unavailable. As a consequence, there may be instances where the Sub-Manager may need to rely on estimated data sourced from third-party data providers. This may differ from actual data that is subsequently published by the relevant entity.

10. Due diligence

The Sub-Manager considers material ESG factors within its fundamental research process, leveraging external ESG data and in-house qualitative assessment to identify potential material risk factors. The ESG due diligence is also implemented through the existence of an exclusion policy and through UN SDGs analysis for the governmental issuers, as described above.

11. Engagement policies

As this Fund implements its strategy using financial derivative instruments, an engagement or stewardship policy is not deemed appropriate by the Sub-Manager.

The relevant actions to meet the environmental and/or social characteristics of the Fund will rather rely on the ESG integration process described above.