

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

Product name: iMGP European Subordinated Bonds Fund Legal entity identifier: 5493009WNONMHMH5OP67

# Environmental and/or social characteristics

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

☒ ☒ ☐ Yes

☐ It will make a minimum of sustainable investments with an environmental objective: \_\_\_\_%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of sustainable investments with a social objective: \_\_\_\_%

☒ ☐ ☒ No

☐ It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective

☒ It promotes E/S characteristics, but will not make any sustainable investments

**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.



## What environmental and/or social characteristics are promoted by this 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 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.

**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?

To attain environmental or social characteristics promoted by the Fund, the portfolio combines negative screening strategies, excluding poorly rated companies, limiting exposure to ESG laggards and defining portfolio targets in terms of ESG profile. In doing so, the Sub-Manager seeks to allocate more capital towards

those issuers that can generate positive externalities for the whole society on a long-term horizon from an environmental and social standpoint by achieving a weighted ESG average score, as measured by the Sub-Manager methodology, equal or higher than 70 on a scale from 0 to 100. The carbon intensity of the portfolio is also monitored.

Among the sustainability indicators used by the Sub-Manager are:

**Environmental indicators:** energy consumption, waste, pollution, reduction of greenhouse gas emissions, combating resource depletion and deforestation, protection of biodiversity and climate change.

Additionally, a strict exclusion policy prevents the investment in companies involved in specific fossil fuel segments above a defined threshold. Companies deriving more than 5% of revenues from coal, unconventional oil & gas and arctic oil & gas are excluded from the investable universe.

**Social indicators:** human resources management, diversity and equal opportunities, working conditions, health and safety.

- ***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 as the Fund does not make sustainable investments.

- ***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 as the Fund does not make sustainable investments.

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

Not applicable as the Fund does not make sustainable investments.

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

Not applicable as the Fund does not make sustainable investments.

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

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

The “do no 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, in line with Article 7 of the Sustainable Finance Disclosure Regulation, this Fund considers the Principal Adverse Impacts (PAI) of its investment decisions.

Adverse sustainability indicator	Metric	Impact year	Explanation and Actions taken, actions planned, and targets set for the next reference period
Carbon footprint	Data available at the end of 2023	2023	The Sub-manager regularly measures the financial product's Carbon footprint and monitors periodically how it evolved with respect to previous periods observations. Carbon footprint has been identified as the most relevant adverse indicator to measure the alignment of the portfolio with the ESG characteristics promoted by the Sub-Manager
Exposure to companies active in the fossil fuel sector	Data available at the end of 2023	2023	The exclusion policy prevents the investment in companies involved in specific fossil fuel segments above a defined threshold. Companies deriving more than 5% of revenues from coal, unconventional oil & gas and artice oil & gas are excluded from the investable universe
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	0%	2023	Companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) are excluded from the investable universe
Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Data available at the end of 2023	2023	Companies non-compliant or acting in violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises are excluded from the investable universe

While the ability to currently meaningfully assess these impacts may be limited by an absence or limited availability and quality of information; the Sub-Manager will continue to further develop these processes to gather, when available, information and data on PAI of their investments.

The present table summarizes the lists of the principal adverse impacts considered by this Fund in its investment process (Annex I of the Commission delegated regulation supplementing Sustainable Finance Disclosure Regulation). More

information on how the Fund considers its principal adverse impacts may be found in the periodic reporting of the Fund.

☐ No



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

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

The investment process is multi-step. First, the investment universe is filtered to exclude non-compliant issuers and securities. Secondly, best investment opportunities are highlighted and selected through proprietary models. Finally, the portfolio is built to reflect the desired risk positioning within a strict investment guidelines framework.

Among the main ESG themes, the Fund aims at emphasizing the social and governance issues, given the strategy is primarily tilted towards financial issuers, whose direct carbon footprint and natural resources exploitation is limited when compared to non-financial issuers.

While this Fund promotes environmental characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any “sustainable investment” within the meaning of the SFDR or the Taxonomy Regulation. Accordingly, it should be noted that this Fund does not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and its portfolio alignment with such Taxonomy Regulation is not calculated. Therefore, the “do not significantly harm” principle does not apply to any of the investments of this Fund.

● ***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 entire investment process described above is binding. With respect to the environmental or social characteristics, the most relevant element is the weighted ESG average score, as measured by the Sub-Manager methodology, which must be equal to or higher than 70 on a scale from 0 to 100. In addition to that, investing in worst-in-class issuers is not allowed and a limit of maximum 10% exposure has been set both for laggard issuers (i.e. with an ESG score below 40/100 according to the Sub-Manager methodology) and not rated issuers.

The following companies or securities shall be excluded from the Sub- Manager selection:

- bonds issued by companies that do not comply with international treaties (such as those on controversial weapons);
- bonds issued by companies or countries that are in serious breach of UN principles or OECD guidelines;
- issuers which operate in countries subject to international sanctions or which violate the UN Global Compact principles;

- bonds issued by companies that are significantly involved in tobacco production, or tobacco distribution;
- bonds issued by companies that derive more than 5% of revenues from adult entertainment and pornography, or manufacturing and distribution of civil weapons, or unconventional oil and gas or Arctic oil and gas extraction, or coal mining or coal-based energy generation;
- bonds issued by companies or countries which are subject to severe ESG controversies depending on data provided by external providers or Sub-Manager internal research.

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

There is no committed minimum rate to reduce the scope of investments prior to the application of the Fund's investment strategy.

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

The Sub-Manager assesses the effectiveness of management in initiating a process of collaboration among the various stakeholders, aimed at ensuring the pursuit of long-term objectives and consequently the long-term value of the company (e.g. executive compensation, tax strategy and practices, anticorruption and abuse of office, diversity and Board structure).

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

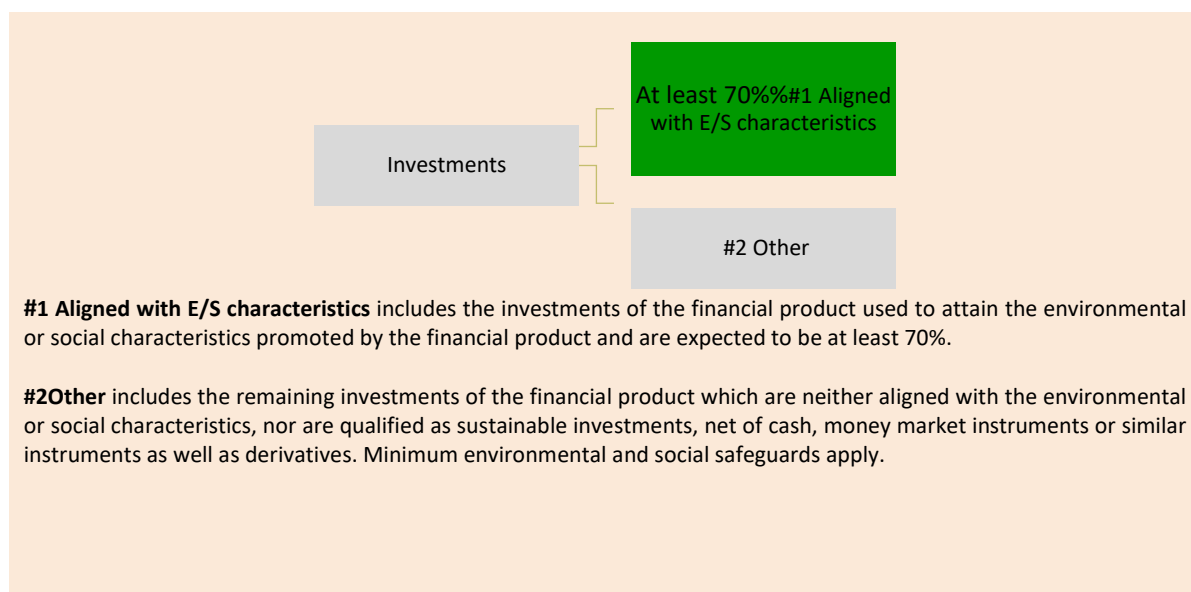
**What is the asset allocation planned for this financial product?**

**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.



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

The ESG performance of the Fund does not take into consideration the derivatives to measure the attainment of environmental and social characteristics promoted.



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

The Fund does not currently commit to invest in any sustainable investment within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **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

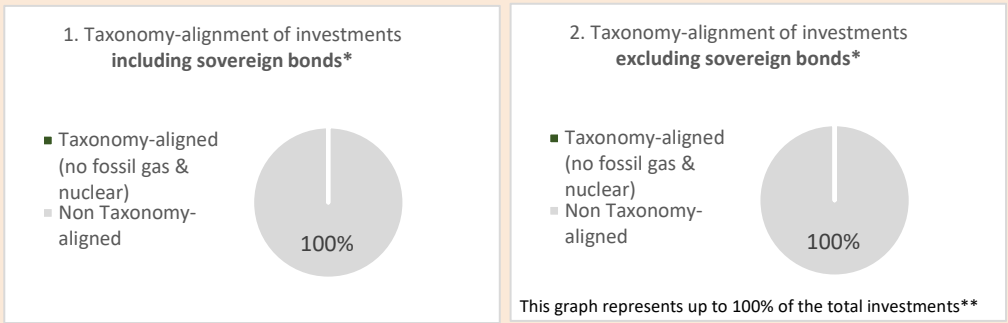
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for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



**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 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.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.  
 \*\*As the Fund does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Fund’s portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

As the Fund does not commit to invest any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy Regulation is therefore also set at 0%.



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

The Fund promotes environmental and/or social characteristics but does not commit to making any sustainable investments. As a consequence, the Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



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

Not applicable as the Fund does not make sustainable investments.



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

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

Other” includes the remaining 30% of the investment portfolio of the financial product which are neither aligned with the environmental or social characteristics nor are qualified as sustainable investments, net of cash, money market instruments or similar instruments and derivatives. Securities included in this category present an ESG score below 40/100 (according to the Sub-Manager methodology) or do not have an ESG rating. For securities included in “Other”, minimum environmental and social safeguards apply. Corporate issuers need to be compliant with the UNGC principles or OECD Guidelines for Multinational Enterprises and not be involved in very severe controversies regarding environmental, social or governance issues or socially controversial activities.



**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: no designated benchmark for this Fund to measure whether the financial product attains the environmental 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.



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

More product-specific information can be found on the website:  
<https://www.imgp.com/en/sustainability>