Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Willerfunds Private Suite - Lombard Odier Natural Capital

Legal entity identifier: 54930087IT0UJM6RN654

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.

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments with an environmental objective:** 70%	☐ 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
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ 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	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What is the sustainable investment objective of this financial product?

The sub-fund invests in companies whose growth will benefit from regulations, innovations, services or products favoring the transition to a more circular economy and to an economy that values natural capital. The sub-fund seeks to invest in high quality companies with sustainable financial models, business practices and business models showing resilience and the ability to evolve and benefit from long term structural trends using inter alia the profiling tools and methodologies set out below.

The sub-fund's investment philosophy is rooted in the Investment Manager's worldview describing a necessary transition from a Wasteful, Idle, Lopsided and Dirty (WILD) economic model to one that is Circular, Lean, Inclusive and Clean (CLIC®). The Investment Manager believes this transition will require a transformation across the global economic systems related to energy, land & oceans and materials, enabled by carbon markets, which the Investment Manager refers to as the '**3+1 framework'**.

The sub-fund focuses in particular on the following transformations:

- **Transformation of land & ocean systems:** transitions across our reliance on land & oceans, including the transformation of agriculture, food and land use (AFOLU) systems through more sustainable food production and sustainable forestry, the expansion of the bioeconomy, and the improvement of water systems, aiming to restore land and ecosystems back to nature.

- **Materials -** transitions across our material systems, including moves towards improved resource productivity, adoption of less harmful production processes, reduced reliance on resource extraction, and reductions and improvement management of waste.

The sub-fund is expected to contribute to the following environmental objectives established by article 9 of the Taxonomy Regulation:

- The sustainable use and protection of water and marine resources
- The transition to a circular economy
- Pollution prevention and control
- The protection and restoration of biodiversity and ecosystems

The sub-fund is also expected to indirectly contribute to Climate change mitigation.

In order to acheive the objectives and contributions described above, the Investment Manager aims to:

- invest the sub-fund's assets primarily in investments making a meaningful contribution to the specific objectives outlined above as determined by reference to the Investment Manager's proprietary classification framework in which activities and companies may be classified as either 'green', 'grey' or 'red' (the "**LOIM Classification Framework**").

- invest at least 70% of the sub-fund's assets in sustainable investments described as 'green' according to the LOIM Classification Framework.

- **The LOIM Classification Framework**

The Investment Manager uses a pass/fail approach to define whether a given investment, defined at the company level, is considered as a "sustainable investment" or not.

The Investment Manager classifies companies into three categories, referred to as Green Star, Grey Star and Red Star companies, with only Green Star companies considered sustainable.

To "pass" as a Green Star company, a company must:

1. Have <u>**at least 25% revenue exposure**</u> to environmentally-sustainable "green" activities, understood to include:

a. Activities that in and of themselves contribute to one of the six environmental objectives recognised by the EU Taxonomy; or

b. Transitioning activities for which there are no technologically and economically feasible low-carbon alternatives, but that support the transition to a climate-neutral economy in a manner that is consistent with Paris-aligned (well below 2C) objectives; or

c. Enabling activities: activities that enable other activities to make a substantial contribution to one or more of the objectives; and

where the specific activities included and technical criteria applicable to these are defined by:

a. The activities and technical criteria already or expected to be included in the EU Taxonomy; or

b. The Investment Manager, where it believes specific activities are either already low-impact within high-impact industries in a relative or absolute sense, contribute to the transition including through commitments to credible transition strategies, or are enabling other activities to meet key thresholds; and

where a company's exposure to relevant activities can be established using either:

a. The company's own disclosures related to the EU Taxonomy; or

b. The Investment Manager's documented assessment of the company and its activities; and

2. Have **at most 5% revenue exposure** to "red" activities that are:

   a. Classified by the Investment Manager as inherently harmful in nature, including activities related to the mining of thermal coal, the generation of power using coal, the extraction or refining of oil and gas, along with selected other activities; or

3. If not meeting the criteria above, to be **dedicating more than 50%** of its capital expenditure to the "green" activities defined above and to have specific targets around the accelerated phaseout or mitigation of any applicable "red" activities; or

4. If not meeting the criteria above, to be subject to a **documented, facts-based assessment** by the Investment Manager – undertaken ex ante for any investments made from January 1, 2023 – outlining the specific reasons the company's activities are considered well-aligned to desirable environmental transitions and are deemed appropriate to a given theme or environmental objective; and

5. In all cases, and as a minimum safeguard, **not have exposure to level 4 and level 5 UN Global Compact controversies** using the Sustainalytics rating scale, subject only to overrides correcting for factual or data errors.

While the above criteria constitute the *minimum* criteria applicable to a Green Star company, the Investment Manager may apply additional criteria to its assessment of companies involved in specific activities to act as additional safeguards, particularly in its assessment of **Do No Significant Harm criteria**. While such additional criteria cannot be used to "pass" companies if they do not meet the criteria above, they may lead companies to "fail" as a sustainable investment even if they meet the criteria above.

Grey Star and Red Star companies: Only companies classified as Green Star companies are considered by the Investment Manager to be sustainable investments. For all other companies, the Investment Manager applies additional criteria to distinguish between Grey Star and Red Star companies. Red Star companies are those companies with material exposure to the "red" activities referenced above, where such companies lack a credible phaseout strategy for those activities or include companies with exposure to high level controversies or other harmful aspects.

There can be no guarantee that the above aims will be achieved.

It should be noted that whilst the Investment Manager may make certain comparisons with one or more benchmarks for certain elements of its investment process as described above, the Investment Manager has not designated a formal benchmark for the purpose of attaining the sustainable investment objective of the sub-fund.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The Investment Manager will focus on the following primary indicator to measure attainment of the specific commitments outlined above:

- the % of the sub-fund's assets invested in 'green', investments accordiing to the LOIM Classification Framework.

Given the specific focus of this sub-fund, the Investment Manager will also prioritise consideration of the portfolio's performance on the following indicators, which are also considered as part of the Investment Manager's do no sigificant harm considerations outlined in the LOIM Classification Framework.

- Water withdrawal (m3 / MEUR revenues)
- Operational assets in biosensitive areas (#)
- Forest management quality score (Investment Manager's scoring system)
- Controversies related to water use, land use or biodiversity (# level 1-5)
- Controversies related to non-GHG emissions, effluents and waste (# level 1-5)

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.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The analysis of possible significant harm to environmental or social sustainable investment objectives forms an inherent part of the analysis undertaken under the LOIM Classification Framework.

This LOIM Classification Framework takes explicit account of any material environmental or social dimensions, an investee company's performance with respect to these indicators, on a current or forward-looking basis.

The Investment Manager identifies 'Sustainable investments' as companies classified as 'green' under the LOIM Classification Framework which have specifically been assessed to not cause significant harm or to be subject to credible mitigating factors.

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

Indicators for adverse impact on sustainability factors are considered as part of the Investment Manager's activity-by-activity assessment of possible significant harm under the LOIM Classification Framework.

The specific Principal Adverse Indicators considered as part of this assessment are described further below.

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

The Investment Manager considers exposure to UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights controversies under to the LOIM Classification Framework. In the absence of credible mitigating factors, companies exposed to high level controversies, will not be considered as ‘green’.

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

☒ Yes

☐ No

Through its LOIM Classification Framework, the Investment Manager considers PAIs as follows:

PAI Table of indicators	PAI indicator #	Indicator description	Approach
Table 1 (mandatory)	1	Scope 1, 2 and 3 emissions	We consider a the scope 1, 2 and material 3 emissions of investee companies and the relevance of emissions to specific activities and sectors. We consider both the current scale of emissions, as well as whether a company has a credible and ambitious decarbonisation strategy in place that is compatible with Paris-aligned objectives, using our internal Implied Temperature Rise assessments. To be considered “green” the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, must be subject to a credible and ambitious mitigation strategy, or the must generate significant avoided impacts on emissions or by virtue of the inherent nature of the activity or activities of the company.
	2	Carbon footprint	
	3	GHG intensity of investee companies	
Table 2 (optional, environmental)	4	Companies without emission reduction initiatives	
Table 1 (mandatory, continued)	4	Companies active in the fossil fuel sector	We assess exposure to business activities deemed fundamentally incompatible with the 3+1 framework. This includes exposure to activities linked to the exploration, production,

			refining and distribution of fossil fuel. The level of exposure to fossil fuel is taken into account as part of the classification of investments into ‘green’, ‘grey’ and ‘red’ categories.
	5	Share of non-renewable energy consumption and production	These two PAIs do not form an explicit part of the Investment Manager's classification framework, but are considered implicitly as part of the PAIs above on the assessment of emissions
	6	Energy consumption intensity per high impact climate sector	
	7	Activities negatively affecting biodiversity-sensitive areas	We assess the intensity of water withdrawals, and generation of hazardous waste, and the proximity of a company’s known operational assets to biosensitive areas and, the quality of a company’s forest management practices, where these considerations are material to the company’s activities. To be considered “green” the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, must be subject to a credible and ambitious mitigation strategy, or the must generate significant avoided impacts on related environmental dimensions or by virtue of the inherent nature of the activity or activities of the company.
	8	Emissions to water	
	9	Hazardous waste ratio	
Table 1 (mandatory, continued)	10	Violations of the UNGC principles and OECD Guidelines for Multinational Enterprises	Exposure to moderate or more severe controversies, and the outlook of such controversies, is considered as part of the classification of investments into ‘green’, ‘grey’ and ‘red’ categories as per the Investment Manager’s framework outlined above.
	11	Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises	
	12	Unadjusted gender pay gap	Aspects related to diversity programmes, board structure, along with other social and governance dimensions form part of the Investment Managers ESG scoring framework, with performance on social and governance scores explicitly taken into account as part of the green, grey, red classification framework outlined above. We endeavour to collect data, where available, on the specific indicators described here but consider these engagement/proxy voting priorities rather than individually forming part of
	13	Board gender diversity	

			the green, grey, red classification framework.
	14	Exposure to controversial weapons	The Sub-fund has an exclusion on companies found to have direct exposure to controversial weapons.
Table 3 (optional, social)	2	Rate of accidents	Where a company is operating in a sector with high risk of fatalities, we consider the company's fatality rate. To be considered "green" the dimensions above must either not be highly material to the company or activity, must already demonstrate improved performance compared to peers, or must be subject to a credible and ambitious mitigation strategy.

What investment strategy does this financial product follow?

In pursuing a sustainable investment objective being a positive environmental impact, the Investment Manager aims to select companies which generate material revenues and/or earnings from business activities that have a positive contribution towards one or more of the following areas of natural capital investment opportunities: Circular Bio-Economy, Resource Efficiency, Outcome-oriented Economy and Zero Waste.

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

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The sub-fund makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Investment Manager's methodology for selecting sustainable investments.

Exclusions

The followinig exclusions are binding:

Exclusion of Controversial Weapons

The sub-fund will exclude direct exposure to companies involved in controversial weapons i.e. companies that produce, trade or store controversial weapons (biological and chemical weapons, anti-personnel mines, cluster weapons, depleted uranium, white phosphorus). The scope of this exclusion includes weapons banned or outlawed by the Ottawa Treaty on landmines (effective 1999), the Convention on Cluster Munitions (Oslo Convention) of 2008, the Biological and Toxin Weapons Convention (BWC – 1972), the Treaty on the Non-Proliferation of Nuclear Weapons

(1968), the Chemical Weapons Convention (CWC – 1993) and SVVK-ASIR exclusion list. In addition, depleted uranium and white phosphorus are excluded.

<u>Exclusion of Tobacco, Coal, Unconventional Oil & Gas and Breaches of the UN Global Compact Principles</u>

The sub-fund will exclude :

<u>Tobacco</u> : companies deriving more than 10% of their revenues from either production of tobacco products or retailing of tobacco products/services.

<u>Thermal Coal:</u>

Mining - companies deriving more than 10% of their revenues from thermal coal extraction.

Power Generation - companies deriving more than 10% of their revenues from coal power generation.

<u>Unconventional Oil & Gas</u> - companies deriving more than 10% in aggregate of their revenues from any of tar sands, shale gas and oil and artic oil & gas exploration.

<u>Material breaches of UN Global Compact Principles, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs) and their underlying conventions:</u> Companies involved in the most severe breaches of the UN Global Compact Principles ("Level 5 Controversies").

The exclusions relating to tobacco, coal, unconventional oil and gas and Level 5 Controversies are subject to the Investment Manager’s exclusion policy and may be overidden in the exceptional circumstances described in that policy, such as where a company makes a firm commitments to a credible and rapid phaseout of the above activities.

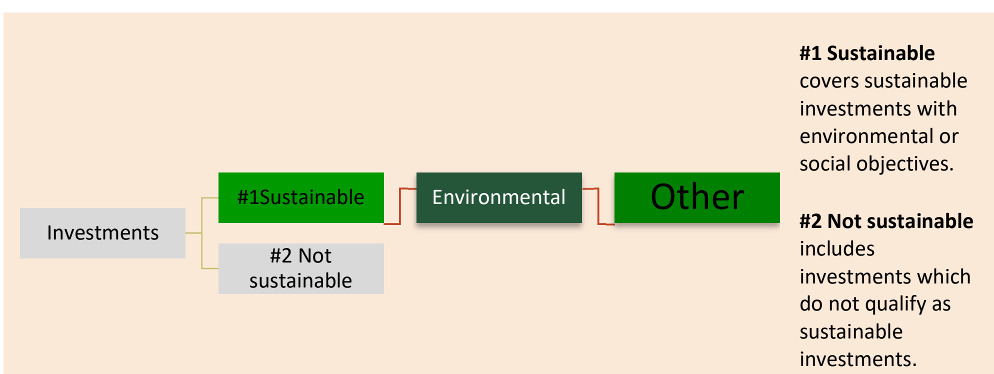
What is the policy to assess good governance practices of the investee companies?

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

The criteria for good governance and minimum social safeguards include an analysis of exposure to high level social and governance controversies and the company’s performance on social and governance scores under the Investment Manager’s proprietary ESG scoring framework, if highly material to the company’s sector. Good governance is also considered as part of the LOIM Classification Framework, including consideration of social and employee matters PAIs (e.g. violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises and lack of processes and compliance mechanisms to monitor compliance with UN Global).

What is the asset allocation and the minimum share of sustainable investments?

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.

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 ad among others have greenhouse gas emission levels corresponding to the best performance.

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

The Investment Manager aims to invest at least 70% of the sub-fund’s assets in #1A Sustainable. Assets which are not sustainable will only include cash and cash equivalents.

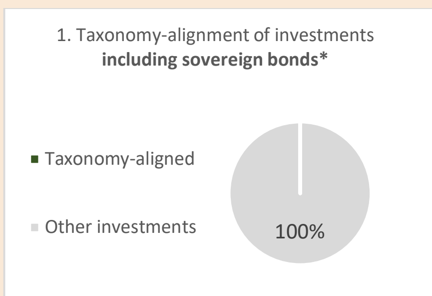
How does the use of derivatives attain the sustainable investment objective?

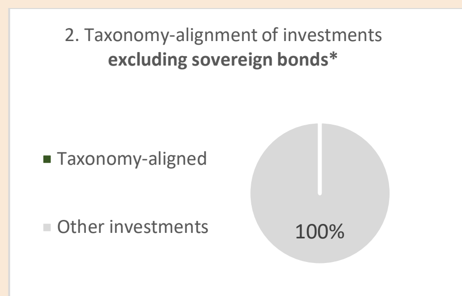
The sub-fund does not use derivatives to attain the sustainable investment objective.

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

The Investment Manager aims to invest at least 70% of the sub-fund’s net assets in sustainable investments.

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*

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

N/A

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

There is no commitment to have any share of the Sub-Fund’s sustainable investments aligned with the EU Taxonomy

What is the minimum share of sustainable investments with a social objective?

0%. The sub-fund focuses on sustainable investments with an environmental and not a social objective.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Investments classified as "#2 Other" will be cash and cash equivalents. Cash may be kept for liquidity purposes or pending investment or where suitable sustainable investments are not available.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

No

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

Not applicable

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

No applicable

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

No applicable

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

No applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

http://www.fideuramireland.ie/en/legal_documentation/

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses.

Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://am.lombardodier.com/files/live/sites/am/files/Documents/AssetManagement/RegulatoryDisclosures/2019/LOIM%20SRI%20Policy%202019.pdf