

# Swisscanto (LU) Equity Fund

Sales Prospectus | July 2023

## Swisscanto (LU) Equity Fund

(hereinafter the “Fund” )

An investment fund under Luxembourg law

### Sales Prospectus

July 2023

This Sales Prospectus is to be read in conjunction with the latest annual report (or semi-annual report if the latter was published after the last annual report). These reports are an integral part of this Sales Prospectus and, in conjunction with it, form the basis for all subscriptions of Fund units. They can be obtained free of charge from all sales agents and online at [www.swisscanto.com](http://www.swisscanto.com).

Only the information contained in this Sales Prospectus and in one of the publicly accessible documents referred to therein is deemed to be valid and binding. If you are in any doubt about the content of this Sales Prospectus, you should consult someone who can give detailed information about the Fund.

The German version of this Sales Prospectus is authoritative; the Management Company and the Depositary may, however, recognise translations authorised by them into the languages of countries in which Fund units are offered and sold as binding on themselves and on the Fund in respect of the units sold to investors in these countries.

Units of the Fund may not be offered, sold or delivered within the United States of America or to persons deemed to be US persons under Regulation S of the US Securities Act of 1933 or the US Commodity Exchange Act, as amended.

### Management and administration

#### Management Company, Central Administration

Swisscanto Asset Management International S.A.  
6, route de Trèves, L-2633 Senningerberg.

Swisscanto (LU) Equity Funds Management Company S.A. was founded as a public limited company in Luxembourg on 25 September 1997, and is established for an indefinite period. Effective 1 July 2011, Swisscanto (LU) Equity Funds Management Company S.A. was merged with Swisscanto Asset Management International S.A. (the Management

Company) and thereafter traded under the name Swisscanto Asset Management International S.A.

The Articles of Association of Swisscanto (LU) Equity Funds Management Company S.A. were published in their original version in the “Mémorial C, Recueil des Sociétés et Associations”, the official gazette of the Grand Duchy of Luxembourg (hereinafter the “Mémorial” ), of 25 October 1997.

The current version of the Articles of Association of Swisscanto Asset Management International S.A. dated 5 June 2023 has been filed with the Luxembourg Trade and Companies Register (RCS), where it is available for inspection. The Management Company is registered with the RCS under registration no. B 121.904.

The object of the Management Company is the collective portfolio management of one or more Luxembourg and/or foreign undertakings for collective investment in transferable securities ( “UCITs” ) subject to Directive 2009/65/EC, as amended, and of other Luxembourg or foreign undertakings for collective investment which do not come under the scope of said Directive, including specialised investment funds pursuant to the provisions of the Act of 13 February 2007 on specialised investment funds ( “UCIs” ), and in accordance with the provisions of the Act of 17 December 2010 on undertakings for collective investment, as amended ( “UCI Act” ).

The paid-up capital of the Management Company amounts to CHF 220,000 and is held by Swisscanto Holding AG, Zurich, a holding company under Swiss law. Swisscanto Holding AG is wholly owned by Zürcher Kantonalbank, Zurich.

In accordance with the UCI Act and the applicable administrative provisions of the Luxembourg supervisory authority (Commission de Surveillance du Secteur Financier, CSSF), the Management Company has adequate and appropriate organisational structures and internal control mechanisms in place. In particular, it shall act in the best interests of the funds or sub-funds and ensure that conflicts of interest are avoided, that resolutions are complied with, procedures are followed and that the holders of units in the funds and sub-funds managed are accorded fair treatment.

The Management Company also manages the following funds, among others:

Swisscanto Asset Management  
International S.A.

- Swisscanto (LU)
- Swisscanto (LU) Bond Fund
- Swisscanto (LU) Money Market Fund
- Swisscanto (LU) Portfolio Fund

### Board of Directors

Chairman:

- Hans Frey, Switzerland  
Managing Director Swisscanto Fondsleitung AG, Zurich

Members:

- Richard Goddard, Luxembourg  
Independent Company Director, The Directors' Office, Luxembourg
- Roland Franz, Luxembourg  
Managing Director Swisscanto Asset Management International S.A., Luxembourg
- Anne-Marie Arens, Luxembourg  
Independent Company Director, Luxembourg

### Management

Members:

- Roland Franz, Luxembourg
- Jasna Ofak, Luxembourg
- Michael Weiß, Germany

### Asset Manager

- Zürcher Kantonalbank  
Bahnhofstrasse 9, 8001 Zurich, Switzerland;
- SPARX Asset Management Co. Ltd.  
Shinagawa Season Terrace 6F, 1-2-70 Konan, Minato-ku, Tokyo 108-0075, Japan.

The management of the Fund assets of the sub-fund Swisscanto (LU) Equity Fund Small & Mid Caps Japan has been contractually assigned to SPARX Asset Management Co. Ltd., Tokyo (hereinafter "SPARX" ), and that of the rest of the sub-funds to Zürcher Kantonalbank, Zurich.

Zürcher Kantonalbank was founded in Zurich in 1870 as an independent public-law institution of the canton of Zurich. It has many years of experience in asset management. The exact execution of duties is governed by an asset management agreement concluded between Swisscanto Asset Management International S.A. and Zürcher Kantonalbank.

SPARX is an independent asset manager established in 1989 in Tokyo, which specialises in Japanese equities. SPARX had USD 7.7 billion in assets under management at the end of March 2015. The exact execution of duties is governed by an asset management agreement concluded between Swisscanto Asset Management International S.A. and SPARX.

The Asset Managers are charged with investing the Fund assets in the best interests of the unitholders. They shall act in accordance with the provisions of the law and the contractual conditions. The Management Company takes ultimate responsibility for the actions of the Portfolio Managers.

Individual asset management agreements may be terminated at any time subject to a period of notice of three months for SPARX and six months for Zürcher Kantonalbank. The Asset Managers are entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund.

### Depository, Principal Paying Agent, Registrar, Transfer Agent

CACEIS Investor Services Bank S.A.

14, Porte de France, L-4360 Esch-sur-Alzette, Luxembourg

### Depository and Principal Paying Agent

The Management Company has appointed CACEIS Investor Services Bank S.A. (hereinafter "the Bank" ), a public limited company under Luxembourg law with its registered office at 14, Porte de France, L-4360 Esch-sur-Alzette, as Depository and Principal Paying Agent (hereinafter the "Depository" ) with the following duties:

- a) safekeeping of assets,
- b) monitoring functions,
- c) monitoring of cash flows and
- d) Principal Paying Agent functions.

in accordance with the UCI Act and the Depository and Principal Paying Agent Agreement concluded between the Management Company, acting on behalf of the Fund, and the Depository, of 18 March 2016 (the "Depository Agreement" ). The Depository Agreement has been concluded for an indefinite period and may be terminated by either party at the end of any calendar month by giving 90 days' written notice.

Swisscanto Asset Management  
International S.A.

CACEIS Investor Services Bank S.A., which was established in 1994 under the name “First European Transfer Agent”, is registered with the RCS under registration no. B 47192. It holds a banking licence under the Luxembourg Act of 5 April 1993 on the financial services sector and specialises in depositary, fund management and related services. As of 31 October 2022, own funds amounted to approximately EUR 1,171,602,000.

The assets of the Fund are held in safekeeping by the Depositary. The function of Depositary is governed by the statutory provisions, the Depositary Agreement and the Management Regulations. The Depositary acts independently of the Management Company and exclusively in the best interests of the unitholders.

The Depositary has been authorised by the Management Company to delegate its safekeeping duties to the following: (i) third parties in the case of other assets and (ii) sub-depositaries in the case of financial instruments. It is also authorised to open accounts with these sub-depositaries.

An up-to-date description of the custody functions delegated by the Depositary and an up-to-date list of the third parties and sub-depositaries appointed may be obtained on request from the Depositary or via the following link:  
<http://gmi.rbcits.com/rt/gss.nsf/Royal+Trust+Updates+Minj/53A7E8D6A49C9AA285257FA8004999BF?opendocument>

When performing its duties under the UCI Act and the Depositary Agreement, the Depositary shall act honestly, transparently, professionally, independently and exclusively in the interests of the Fund and its investors.

The Depositary’s monitoring functions include ensuring that:

- the issue, redemption and conversion of units by the Management Company, or by the Management Company acting on behalf of the Fund, are carried out in accordance with the UCI Act and the Management Regulations;
- the value of the units is calculated in accordance with the UCI Act and the Management Regulations;

- the instructions of the Management Company, acting on behalf of the Fund, are executed unless they conflict with the Management Regulations;
- in the case of transactions involving the Fund’s assets, all amounts are transferred to the Fund within the normal time limits;
- the Fund’s net income is appropriated in accordance with the UCI Act and the Management Regulations.

In addition, the Depositary ensures that cash flows are properly monitored in accordance with the UCI Act and the Depositary Agreement.

#### **Conflicts of interest on the part of the Depositary**

Conflicts of interest may arise from time to time between the Depositary and its agents; for example, if the agent is a group company that receives a fee for other custody services that it provides for the Fund. On the basis of the applicable laws and ordinances, the Depositary continuously monitors potential conflicts of interest that may arise during the performance of its function. All potential conflicts of interest identified are dealt with in accordance with the Depositary’s conflicts of interest policy, which is in turn subject to the laws and ordinances applicable to financial institutions according to the Act of 5 April 1993 on the financial services sector.

Other potential conflicts of interest may arise on account of the fact that the Depositary and/or its group companies provide other services for the Fund, the Management Company and/or third parties. Thus, the Depositary and/or its group companies may act as depositary and/or manager of other funds. There is therefore a risk that the business activities of the Depositary or its group companies are exposed to (potential) conflicts of interest with the Fund, the Management Company and/or other funds on behalf of which the Depositary (or one of its group companies) is acting.

The Depositary has formulated and implemented a conflicts of interest policy, the primary aim of which is to:

- identify and analyse situations that could give rise to potential conflicts of interest;
- record, manage and monitor conflicts of interest by means of:
  - functional and hierarchical segregation to ensure that the Depositary’s duties as depositary are performed separately from any potentially conflicting duties;

- taking preventative measures to avoid any type of activity that could give rise to conflicts of interest, such as:
  - the Depositary and any third party to which depositary duties have been delegated shall refuse any investment management role;
  - the Depositary shall decline any delegation of compliance and risk management duties;
  - the Depositary has established an effective escalation process to ensure that regulatory breaches are reported to the compliance department, which in turn reports material breaches to the company management and Board.
  - the Depositary has its own specialised audit department that performs risk assessments independently and objectively as well as evaluates internal control procedures and administrative processes in terms of suitability and efficiency.

Based on the aforementioned, the Depositary confirms that no potential conflict of interests has been identified.

The current conflicts of interest policy is available from the Depositary on request or via the following link: [https://www.rbcits.com/AboutUs/CorporateGovernance/p\\_InformationOnConflictsOfInterestPolicy.aspx](https://www.rbcits.com/AboutUs/CorporateGovernance/p_InformationOnConflictsOfInterestPolicy.aspx)

The Depositary is entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund.

**Registrar and Transfer Agent:**

The Management Company has delegated its duties as the Fund’ s registrar and transfer agent (the “Registrar and Transfer Agent” ) to CACEIS Investor Services Bank S.A. under the Investment Fund Services Agreement of 1 July 2021. The Central Administration Agreement has been concluded for an indefinite period and may be terminated by either party by giving 90 days’ written notice.

The Registrar and Transfer Agent is responsible for processing subscription and redemption orders, managing the unit register, and accepting unit certificates that are returned for the purpose of replacement or redemption.

The Fund’ s Registrar and Transfer Agent is responsible for taking appropriate measures to ensure compliance with the regulations governing the prevention of money laundering in accordance with the legislation in force in the Grand Duchy of Luxembourg and observing and implementing the circulars of the Luxembourg supervisory authority.

Depending on the individual subscription or transfer application, the detailed identification of the client may not be necessary provided that the application is made through a financial institution or authorised financial service provider and that this party is simultaneously established in a country that operates rules equivalent to those under the Luxembourg Money Laundering Act. A list of countries that operate rules equivalent to those under the Luxembourg Money Laundering Act is available on request from the Registrar and Transfer Agent.

The Registrar and Transfer Agent is entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund.

**Fund accounting and net asset value (NAV) calculation**

Swisscanto Asset Management International S.A.  
6, route de Trèves, L-2633 Senningerberg

The Management Company shall perform tasks relating to fund accounting and NAV calculation. These functions essentially comprise fund accounting and calculation of the net asset value of fund units, the preparation of the fund’ s annual and semi-annual reports and the presentation to the auditor of the annual and semi-annual reports under the terms of Luxembourg law and in accordance with the requirements of the Luxembourg supervisory authority. These tasks will be carried out by Swisscanto Fondsleitung AG as service provider and will be the responsibility of the Management Company.

**Independent auditors:**

Ernst & Young S.A.  
35E, Avenue John F. Kennedy, L-1855 Luxembourg

**Specific provisions governing the sale of units in Germany, Austria and Liechtenstein**

Information regarding the Paying and Information Agent for unitholders in Germany are provided on page 36.1 of this Sales Prospectus.

Information regarding the Paying and Information Agent for unitholders in Austria are provided on page 36.2 of this Sales Prospectus.

Information regarding the Paying and Information Agent for unitholders in Liechtenstein are provided on page 36.3 of this Sales Prospectus.

**Overview of sub-fund distribution authorisation abroad:**

An overview of countries, in which the sub-funds of the Swisscanto (LU) Equity Fund are authorised, can be found on the website [www.swisscanto.com](http://www.swisscanto.com).

## Swisscanto (LU) Equity Fund

### Details

## 1 General Information about the Fund

### 1.1 Legal aspects

Swisscanto (LU) Equity Fund is an open-ended investment fund under Luxembourg law and was established on 13 January 1998. The Fund is managed by the Luxembourg public limited company Swisscanto Asset Management International S.A. CACEIS Investor Services Bank S.A. has been entrusted with the duties of Depositary.

The Fund was first offered for subscription in December 1999.

Since 14 October 2005, the Fund has been subject to the statutory provisions of Part I of the UCI Act.

The Management Company is subject to section 15 of the UCI Act.

The portfolios and other assets of the Fund are managed by the Management Company as a discrete pool of assets in the interests and for the account of the unitholders.

The Fund assets in their entirety are jointly owned by all the investors, who hold equal entitlements in proportion to their holdings. The assets of the Fund are separate from those of the Management Company. The Management Regulations make no provision for a meeting of unitholders. By subscribing for or acquiring units, the unitholder agrees to abide by the Management Regulations.

Unitholders, their heirs and other beneficiaries may not demand the dissolution, division or merger of the Fund.

The Fund is not limited in terms of duration or total assets, and its financial year ends on 31 March.

The Management Company would like to make investors aware of the fact that unitholders may not assert all their investor rights directly against the Fund as they are not registered in the Fund's register of unitholders in their own name. Since investors may only invest in the Fund via an intermediary, who acquires the investment in its name but on behalf of the investor, it is possible that not all rights pertaining to the investment can be upheld directly against the Fund by the unitholder. Investors are advised to inform themselves of their rights.

The Management Regulations of the Fund were published for the first time on 25 February 1998 in the "Mémorial". A number of amendments have been made, which were carried out in accordance with the Management Regulations. A notice of the most recent amendment is published in the electronic platform for companies and associations (*Recueil Electroniques des Sociétés et Associations*, hereinafter "RESA"). The current version of the Management Regulations dated 21 July 2023 has been filed with the Luxembourg Trade and Companies Register, where it is available for inspection.

#### 1.1.1 Liquidation

The Management Company is entitled to dissolve the Fund, sub-fund or unit classes at any time. The Fund must be dissolved and liquidated if its total net assets fall short of a quarter of the statutory minimum requirement for fund assets for more than six months. If a sub-fund's net assets fall below CHF 500,000 or the equivalent in other currencies, or should economic, legal or monetary circumstances change, the Management Company may decide to dissolve a sub-fund, merge sub-funds or incorporate a sub-fund into another open-ended investment fund in accordance with Part I of the UCI Act.

The decision to dissolve or liquidate the Fund will be published in the RESA, and in at least two other newspapers, including the "Luxemburger Wort". From the day on which the dissolution and liquidation decision is made, no further units will be issued or redeemed. In the event of the dissolution and liquidation of a sub-fund or unit class, this applies only to the sub-fund or unit class in question. Upon liquidation, the Management Company will realise the Fund assets in the best interests of the unitholders and instruct the Depositary to distribute the net liquidation proceeds to the unitholders in proportion to their holdings. Any liquidation proceeds that could not be distributed to the unitholders at the end of the liquidation process will be deposited with the Caisse de Consignation in Luxembourg until their distribution becomes statute-barred.

#### 1.1.2 Merger

The Management Company may, by decision of the Board of Directors and, where applicable, in accordance with the UCI Act and the conditions and procedures stipulated in the relevant administrative regulations, merge the Fund or one or more sub-funds of the Fund with an existing or jointly established sub-fund, or other Luxembourg funds or sub-

funds, either by dissolution without winding up, or by continuing to exist until all liabilities are discharged. No provision is made for a merger with an investment fund established under a law other than that of Luxembourg.

Unitholders are entitled, within 30 days, to demand either that their units be redeemed or, as the case may be, converted into units of another fund or sub-fund which has a similar investment policy and which is managed by the same management company or by another company with which the Management Company is associated, either through common management or control, or by way of a significant direct or indirect holding, without incurring more costs than those retained by the Fund or sub-fund to cover the dissolution costs.

Insofar as applicable, in accordance with the conditions and procedures cited in the UCI Act and in the pertinent administrative regulations, unitholders will be informed in good time of any merger.

## 1.2 Structure of the Fund

Under one and the same investment fund ( "umbrella" ), the investor is offered sub-funds with different investment policies. Together, the sub-funds constitute the Fund. Every investor participates in the Fund through participation in a sub-fund. In relations between unitholders, each sub-fund is regarded as a discrete pool of assets in its own right. The rights and duties of the unitholders of a given sub-fund are separate from those of the unitholders of the other sub-funds. Each sub-fund is also regarded as a separate fund with regard to the investments and investment policy under section 2.

The Management Company may decide at any time to add more sub-funds or groups of sub-funds or to stipulate the terms of issue of sub-funds or groups that have already been approved but not yet launched. The Management Company will notify the unitholders of this and amend the Sales Prospectus accordingly.

## 1.3 Unit classes

The Board of Directors is authorised to create additional unit classes at any time. The Board of Directors may also decide, where appropriate for economic or legal reasons, to cancel a unit class and to exchange the outstanding units within a sub-fund for units in another unit class. Such resolutions on the part of the Board of Directors will be published in accordance with the provisions laid down in Article 14 of the Management Regulations.

An overview of the active unit classes is available free of charge from the Management Company and is also published on the website [www.swisscanto.com](http://www.swisscanto.com).

## 1.4. Distinctive features of unit classes

The unit classes differ in terms of the following characteristics:

- investor base,
- appropriation of net income,
- reference currency,
- currency hedging and
- fee rates.

### 1.4.1. Investor base or characteristics of the unit classes

The investor base of the unit classes are as follows:

#### a) Class A units

Class A units are open

- to all investors and
- may be offered by all distributors.

For class A units, an all-in fee is charged to the Fund assets.

#### b) Class B units

Class B units are offered to all investors

- who have concluded an agreement in writing or in another form demonstrable via text with a cooperation partner that includes authorisation for class B units, and
- provided a cooperation agreement exists between the cooperation partner and a company in the Swisscanto Group.

For class B units, an all-in fee is charged to the Fund assets.

#### c) Class C units

Class C units are offered to all investors

- who have concluded a long-term investment advisory agreement in writing or in another form demonstrable by text with a cooperation partner that includes authorisation for class C units, and
- provided a cooperation agreement exists between the cooperation partner and a company in the Swisscanto Group.

For class C units, an all-in fee is charged to the Fund assets.

#### d) Class D units

Class D units are only open

- to institutional investors as defined in section 1.4.1 i) of this Sales Prospectus and
- may in principle be offered by all distributors.

For class D units, an all-in fee is charged to the Fund assets



e) Class G units

Class G units are only open to investors that meet the following conditions:

- The investors are institutional investors as defined in section 1.4.1. j) i) of this Sales Prospectus.
- The investors have concluded a long-term investment agreement in writing or in another form demonstrable by text with a bank or other professional entity operating in the financial sector.
- Banks and other professional entities operating in the financial sector may only offer or subscribe to the units for the account of a third party if a corresponding cooperation agreement exists with a company in the Swisscanto Group.

For class G units, an all-in fee is charged to the Fund assets.

f) Class M units

Class M units are offered only to investors

- who have concluded an individual investment advisory agreement in writing or in another form demonstrable by text with Zürcher Kantonalbank that includes authorization for the unit classes listed above, and
- provided Zürcher Kantonalbank has concluded a cooperation agreement with a company in the Swisscanto Group.

The Management Company is compensated by Zürcher Kantonalbank, Zurich, for the management of the Fund (i.e. running the Fund, asset management as well as distribution and other costs that arise, if compensation is made for such costs; in particular, fees and costs of the Depositary) not by the all-in fee but by the remuneration set out in the above investment advisory agreement. No all-in fee is therefore charged to the Fund assets.

g) Class N units

Class N units are open to investors that are acting for their own account and meet the following conditions:

- The investors are institutional investors as defined in section 1.4.1. i) of this Sales Prospectus who have concluded a service agreement in writing or in another form demonstrable by text (asset management agreement, advisory agreement, investment agreement or another service agreement) with a relevant cooperation partner of Swisscanto Asset Management International S.A. or another company within the Swisscanto Group; non-institutional clients are excluded even if they have concluded a discretionary management agreement; or
- The investors have concluded an individual asset management agreement with Zürcher Kantonalbank.

Banks can only offer or subscribe to the units for the account of a third party if a corresponding cooperation agreement exists with a company in the Swisscanto Group.

The Management Company is compensated for the management of the Fund (i.e. running the Fund, asset management, distribution and other costs that arise, if compensation is made for such costs; in particular, fees and costs of the Depositary) not by the all-in fee, but by the remuneration set out in the above agreements between the investor, on the one hand, and Zürcher Kantonalbank or a cooperation partner of Zürcher Kantonalbank, a company in the Swisscanto Group or a bank, on the other. No all-in fee is therefore charged to the Fund assets.

h) Class S units

Class S units are only

- open to Swisscanto Asset Management International S.A. or
- other management companies that have concluded a cooperation agreement with Swisscanto Asset Management International S.A.

Class S units are issued in the corresponding currency (unit of account), initially in the amount of 100,000 (JPY 10,000,000); no all-in fee is charged.

The remuneration due to the Management Company and its agents for running the Fund, asset management and, if applicable, distribution is not charged to the Fund assets but is paid separately on the basis of an individual agreement or arrangement between Swisscanto Asset Management International S.A. and the investor.

i) Institutional investors

The following are deemed to be institutional investors:

- banks and other professional entities operating in the financial sector, whether acting for their own account or acting on behalf of other institutional investors or on behalf of non-institutional clients under a discretionary management agreement;
- public entities that invest their own assets;
- insurance and reinsurance companies;
- pension schemes;
- industrial, commercial and group finance companies;
- Undertakings for collective investment and other fund structures;
- holding companies or similar companies whose shareholders are all institutional investors;

- family holding companies or similar entities whose purpose is to hold financial investments for very high net worth individuals or families;
- holding companies or similar entities that, in view of their structure and business dealings, possess genuine intrinsic value independently of the beneficial owners as well as hold significant financial investments.

#### 1.4.2 Appropriation of net income

Furthermore, the unit classes differ in terms of the appropriation of net income.

Unit classes with an “A” as the second letter of their name, e.g. AA or MA CHF, are issued as distribution units. Under Article 12 of the Management Regulations, the Management Company will decide, after closing the annual accounts, whether and to what extent distributions are to be made on distribution units. The intention is to pay out the majority of earnings on distribution units. Unit classes with a “T” as the second letter of their name, e.g. AT or MT CHF, are issued as accumulation units. No distributions are planned for these unit classes. After the deduction of general costs, net income will be used to increase the net asset value of the units (accumulation).

#### 1.4.3 Reference currency

If the reference currency of a unit class differs from the sub-fund’s currency of account, three letters representing the abbreviation of the relevant currency are suffixed to the name of the unit class.

Unit classes whose reference currency differs from the sub-fund’s currency of account can therefore be distinguished as follows:

- unit classes with “CHF” as the last three letters of their name, e.g. AT CHF or MA CHF, have the Swiss franc (CHF) as reference currency for the unit class concerned, or
- unit classes with “EUR” as the last three letters of their name, e.g. AT EUR or MA EUR, have the euro (EUR) as reference currency for the unit class concerned.

#### 1.4.4 Currency hedging

The unit classes differ in terms of currency hedging:

unit classes with an “H” as the third letter of their name, e.g. ATH CHF or MAH CHF, are unit classes for which systematic currency hedging is conducted. This means currency fluctuations between the currencies of the currency classes and the currencies of account of the sub-funds are, for the most part, hedged.

In the case of unit class GA of the sub-fund Swisscanto (LU) Equity Fund Systematic Responsible Selection International, apart from the currency hedging associated with the letter “H” in the name, a form of currency hedging may be done whereby the risk exposure in respect of the investment currencies is optimally hedged against the relevant reference currency of the unit class. In such instances, the name of the unit class contains “H1”. The name of the unit class would therefore appear as GAH1 EUR. However, only one of the two types of currency hedging may be used for any one unit class.

For all other unit classes, no currency hedging is conducted at unit-class level.

#### 1.4.5 Fee rates

The unit classes differ in terms of the maximum fee rates that are charged annually to the relevant unit class. The maximum annual all-in fee, management fee and administration fee for each sub-fund are stated in the table below. The new fees for Swisscanto (LU) Equity Fund Systematic Responsible USA (formerly Swisscanto (LU) Equity Fund Selection North America) shall take effect on 15 November 2018. The new fees for Swisscanto (LU) Equity Fund Systematic Responsible Selection International (formerly Swisscanto (LU) Equity Fund Selection International) shall take effect on 8 November 2018. Until this date, the existing fees shall apply.

Sub-fund name	Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee <sup>1</sup>	Max. annual flat management fee <sup>1</sup>	Max. annual flat administration fee <sup>1</sup>
1. Swisscanto (LU) Equity	EUR	A	5.0%	2.00%	1.60%	0.50%

<sup>1</sup>The all-in fee is made up of two components: the flat management fee and the flat administration fee. The sum of the flat management fee and flat administration fee booked may not exceed the rate for the maximum all-in fee. The fees booked are reported in the annual and semi-annual reports.

	Sub-fund name	Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee <sup>1</sup>	Max. annual flat management fee <sup>1</sup>	Max. annual flat administration fee <sup>1</sup>
	Fund Systematic Responsible Eurozone		B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
2.	Swisscanto (LU) Equity Fund Systematic Responsible Japan	JPY	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
	S	5.0%	0.00%	0.00%	0.00%		
3.	Swisscanto (LU) Equity Fund Systematic Responsible Emerging Markets	USD	A	5.0%	2.20%	1.80%	0.50%
			B	5.0%	1.65%	1.30%	0.50%
			C	5.0%	1.45%	1.15%	0.50%
			D	5.0%	1.35%	1.10%	0.25%
			G	5.0%	1.10%	0.90%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
	S	5.0%	0.00%	0.00%	0.00%		
4.	Swisscanto (LU) Equity Fund Systematic Responsible Global	USD	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
	S	5.0%	0.00%	0.00%	0.00%		

	Sub-fund name	Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee <sup>1</sup>	Max. annual flat management fee <sup>1</sup>	Max. annual flat administration fee <sup>1</sup>
5.	Swisscanto (LU) Equity Fund Small & Mid Caps Japan	JPY	A	5.0%	2.50%	2.20%	0.50%
			B	5.0%	1.90%	1.60%	0.50%
			C	5.0%	1.75%	1.40%	0.50%
			D	5.0%	1.70%	1.55%	0.25%
			G	5.0%	1.50%	1.30%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
6.	Swisscanto (LU) Equity Fund Responsible Europe Top Dividend	EUR	A	5.0%	2.10%	1.70%	0.50%
			B	5.0%	1.60%	1.25%	0.50%
			C	5.0%	1.40%	1.10%	0.50%
			D	5.0%	1.25%	1.00%	0.25%
			G	5.0%	1.05%	0.85%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
7.	Swisscanto (LU) Equity Fund Sustainable Global Climate	EUR	A	5.0%	2.50%	2.20%	0.50%
			B	5.0%	1.90%	1.60%	0.50%
			C	5.0%	1.75%	1.40%	0.50%
			D	5.0%	1.70%	1.55%	0.25%
			G	5.0%	1.50%	1.30%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
8.	Swisscanto (LU) Equity Fund Sustainable Global Water	EUR	A	5.0%	2.50%	2.20%	0.50%
			B	5.0%	1.90%	1.60%	0.50%
			C	5.0%	1.75%	1.40%	0.50%
			D	5.0%	1.70%	1.55%	0.25%
			G	5.0%	1.50%	1.30%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%

Sub-fund name		Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee <sup>1</sup>	Max. annual flat management fee <sup>1</sup>	Max. annual flat administration fee <sup>1</sup>
9.	Swisscanto (LU) Equity Fund Responsible Global Innovation Leaders	EUR	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
10.	Swisscanto (LU) Equity Fund Sustainable	EUR	A	5.0%	2.10%	1.70%	0.50%
			B	5.0%	1.60%	1.25%	0.50%
			C	5.0%	1.40%	1.10%	0.50%
			D	5.0%	1.25%	1.00%	0.25%
			G	5.0%	1.05%	0.85%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
12.	Swisscanto (LU) Equity Fund Systematic Responsible Selection International	CHF	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%
13.	Swisscanto (LU) Equity Fund Systematic Responsible USA	USD	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%

Sub-fund name		Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee <sup>1</sup>	Max. annual flat management fee <sup>1</sup>	Max. annual flat administration fee <sup>1</sup>
14.	Swisscanto (LU) Equity Fund Sustainable Europe	EUR	A	5.0%	2.00%	1.60%	0.50%
			B	5.0%	1.50%	1.20%	0.50%
			C	5.0%	1.30%	1.05%	0.50%
			D	5.0%	1.20%	0.95%	0.25%
			G	5.0%	1.00%	0.80%	0.25%
			M	5.0%	0.00%	0.00%	0.00%
			N	5.0%	0.00%	0.00%	0.00%
			S	5.0%	0.00%	0.00%	0.00%

## 1.5 Investor profile

The sub-funds are primarily intended for private investors. A number of sub-funds also issue classes of units which are reserved for institutional investors.

The Fund is suitable for investors who wish to invest primarily in shares and other equity securities and participation rights.

Investors are expressly advised that changes in the net asset value may be triggered by a number of factors, including, but not limited to fluctuations in prices, currencies and interest rates.

## 1.6 Risk notice

### 1.6.1 General information

The net asset value of the units may rise or fall. When redeeming their units, unitholders may therefore receive less than they originally paid for them. There is no guarantee of a return on investment.

In addition to the general market risks that are associated with financial investments, there exists a counterparty risk and the currency and transfer risk inherent in foreign investments.

Investment risk is reduced in that, in accordance with the investment policy, the investments ensure a reasonable distribution of risk.

Nevertheless, it must be emphasised that even equity investments are subject to risks. The prices of investments

may both rise and fall against the original price. This depends, in particular, on the development of capital markets and national economies as a whole, as well as individual sectors in those economies, or on the specific developments affecting the issuers in question. The credit risk associated with an investment in equity securities and participation rights cannot be completely eliminated, even with careful selection.

### 1.6.2 Sub-funds with currency classes

A sub-fund does not hold a discrete portfolio of assets for each of its unit classes. The assets and liabilities of each unit class are allocated pro rata.

In the case of sub-funds with currency classes; that is, when the sub-fund's currency of account is, for example, USD and the currency class is given as EUR (reference currency), investors are advised that any currency effects may be hedged but are not necessarily systematically hedged. In the case of currency classes with "H" in their name, investments are largely hedged against the risks of exchange rate fluctuations between the sub-fund's currency of account and the currency of the currency class (reference currency). Where hedging is carried out, the success of the currency hedging transactions cannot be guaranteed and, in individual cases, market movements may result in over- or underhedging. The costs, profits and losses in connection with these currency hedging transactions are credited to or debited from the respective unit class with "H" in their name.

In cases of hedging of unit classes against the currency risk to which the currency of account and the currency of the currency class is exposed, the sub-fund can incur liabilities related to currency hedging transactions entered into with respect to and to the benefit of a single unit class. The costs, profits and losses in connection with these currency hedging transactions are allocated to the respective unit class. However, it cannot be ruled out that in exceptional cases the currency hedging transactions for one unit class may negatively affect the net asset value of the other unit classes.

### 1.6.3 Derivative financial instruments

The Fund takes up additional risk positions by using derivatives in the pursuit of its investment objective. Derivatives are rights or obligations the valuations of which are derived mainly from the price, price fluctuations and expected price of an underlying instrument. Investments in derivatives are subject to general market risk, management risk, credit risk and liquidity risk. However, because of the specific structuring of derivative financial instruments, the nature of the risk in question may be different and may in some cases be greater than the risks associated with investments in the underlying instruments. The use of derivatives therefore not only requires an understanding of the underlying instrument, but also a sound knowledge of the derivatives themselves. Exposure on the futures and options market and to swaps and foreign exchange is associated with investment risks and transaction costs to which the Fund would not be subject had it not applied such strategies. These risks include among others:

- The risk that the Management Company's forecasts about future trends in interest rates, securities prices and the foreign currency markets prove in retrospect to be incorrect;
- The imperfect correlation between the prices of futures and options contracts, on the one hand, and movements in the prices of the securities or currencies they are intended to hedge, on the other, means that a complete hedge may not be possible in some circumstances;
- The potential absence of a liquid secondary market for a specific instrument at a given point in time may mean that a derivative position cannot, under certain circumstances, be neutralised (closed out) at a profit, even though this would make sense from an investment policy perspective;
- The risk of not being able to sell the securities underlying the derivative instruments at a favourable time or having to buy or sell them at an unfavourable time;

- The use of derivatives may potentially result in a loss which may be impossible to predict and which may even exceed margin payments;
- The risk of insolvency or payment default on the part of a counterparty.

In the case of investments in derivatives on CO<sub>2</sub> emission allowances, it should be noted that the prices of CO<sub>2</sub> emission allowance derivatives are dependent on the demand or anticipated demand for CO<sub>2</sub> emission allowances. In addition, CO<sub>2</sub> emission certificates are subject to political and regulatory uncertainties, which can increase the volatility of the investments and thus lead to a higher risk than with traditional forms of investment. Investments in CO<sub>2</sub> emission allowance derivatives are considered neutral in terms of their impact on climate change. Accordingly, investments in CO<sub>2</sub> emission certificate derivatives are not taken into account for the implementation of the sustainability policy.

### 1.6.4 Investments in emerging markets and developing countries

In view of the prevailing political and economic situation in emerging markets and developing countries, investors should be aware that investments in sub-funds which invest in such markets pose a substantial risk, which could reduce the earnings for the respective Fund assets. Therefore, subscriptions of such sub-funds are only suitable for investors who are fully aware of the risks of this form of investment and are able to bear such risks. Only long-term investments should be made in these sub-funds.

Investments in sub-funds which invest in emerging markets are exposed to the following risks (among others):

- public oversight that is less efficient, accounting and auditing methods and standards which do not meet the requirements of Western legislations;
- possible restrictions on the repatriation of the invested capital;
- counterparty risk with respect to individual transactions;
- market volatility or;
- insufficient liquidity of the sub-fund's investments;

All of these factors may be exacerbated by the prevailing conditions in the individual developing countries. The fact that the companies are selected independent of their market capitalisation (micro, small, mid, large caps), their sector and their geographical location must also be taken into account. This can result in geographical or sector-specific concentration.

### 1.6.5 Risks associated with REITS

The value of real estate depends on capital market and mortgage rates in particular, but also on general economic growth. Similar to bonds, real estate reacts to changes in interest rates. Depending on market performance, the market price of target funds or real estate companies may be above or below their net asset value or the intrinsic value of the real estate investments. There is often no or only limited liquidity in real estate markets. In some circumstances, subscription and redemption of target funds may be restricted. In addition, individual target funds or real estate companies may hold assets that are difficult to value. Valuations may be based on estimates.

Significantly inflated prices or bubbles may arise in the real estate market. Furthermore, with real estate investments, factors such as regulatory changes, construction cost or schedule overruns, higher maintenance costs, loss of contractual partners (in particular tenants), hidden building defects and legacy issues as well as reduced sales proceeds may decrease the earnings of such a collective investment scheme.

### 1.6.6 Investments in Russia

The following applies to the assets of sub-funds which also invest in Russian securities: Investments in companies domiciled in Russia or which conduct the majority of their business operations in Russia are made in the form of Global Depositary Receipts (GDRs) and American Depositary Receipts (ADRs) as well as in equity securities and participation rights in accordance with section 2.1 traded on the Russian Trading System Stock Exchange (RTS) or on the Moscow Interbank Currency Exchange (MICEX).

#### 1.6.6 Custody and registration risk in Russia

- Although exposure to the Russian equity markets is well-covered by the use of GDRs and ADRs, individual sub-funds may invest, in accordance with their investment policy, in securities that could require the use of local depositary and/or custody services. At present in Russia, delivery in book-entry form is proof of legal entitlement to shares.
- The register is crucially important to the custody and registration process. Registrars are not subject to any real state supervision and there is a possibility of the sub-fund losing its registration due to fraud, negligence or sheer inattentiveness. In addition, compliance with the provision that applies in Russia – which states that companies with more than 1,000

shareholders must employ their own, independent registrars who meet the statutory criteria – is not strictly enforced. Owing to this lack of independence, the management of a company has the potential to exert a strong influence over the composition of the shareholders of that company.

- The falsification or destruction of the register could greatly diminish or, in certain cases, even wipe out the sub-fund's holding of that company's shares. Although the Depositary has ensured that the appointed registrars are properly supervised by a service provider in Russia specialising in this field, it is not possible for either the sub-fund, the investment adviser, the Depositary, the Management Company, the Board of Directors of the Management Company or any of the sales agents to give assurances or warranties or guarantees for the actions or performance of the registrar. The sub-fund bears this risk.

### 1.6.8 Risks associated with securities lending

#### a) Counterparty risk

Securities lending involves counterparty risk, i.e. the risk that the loaned securities are not returned or not returned in a timely manner. The principal is required to have a very high credit rating. A very high credit rating means at least a AA rating and refers to the long-term rating of recognised rating agencies; the median of the long-term ratings of the rating agencies is applied.

Counterparties belonging to the same group as the Management Company, and with which the latter conducts securities lending transactions, perform their activities under these transactions with the standard of care customary in commercial transactions. Investors should nevertheless be aware that the Management Company may be exposed to conflicts of interest with the interests of counterparties of the same group.

#### b) Risk of price changes

The risk is that in the period between the receipt of the collateral in the event the securities lent by the sub-fund are not returned by the borrower and the recovery of the securities, the markets change to the detriment of the Fund and the value of the collateral provided is reduced to a value lower than that of the securities originally borrowed.

To avoid such a loss, haircuts are applied to the collateral. There are also restrictions on the accepted collateral.



c) Liquidity risk

The Fund bears the risk of a negative impact on performance when lent securities offer the borrower additional opportunities for short positions. There is a risk that losses could be suffered (especially if an issuer is downgraded and securities have to be sold because of their rating (forced selling)).

Securities lending makes it possible for other participants to sell securities short, which can also put pressure on prices at the same time as the forced selling. For example, short selling and forced selling can simultaneously contribute to increased liquidity losses.

d) Operational risk

If a borrower fails to return securities borrowed from a sub-fund, there is a risk that the collateral provided will have to be sold at a lower value than that of the securities originally borrowed. To avoid such a loss, haircuts are applied to the collateral. Regardless of these risks, various factors (e.g. the incorrect valuation of collateral, negative market performance, a credit downgrade of the issuer, or the illiquidity of the market on which the collateral is traded) may result in the use of collateral having a negative impact, which in turn can lead to a negative performance by the sub-fund.

There is also a risk that the borrowed securities cannot be returned within the given deadline. In this case, the borrower is obliged to compensate in full for any losses suffered as a result of the recovery of the security.

e) Depositary risks

Depositary risk refers to the possibility of loss of the Fund's securities deposited with a depositary as a result of insolvency, sanctions, negligence or malicious action on the part of the depositary and any sub-depositaries.

f) Legal risks

Legal risks may arise from changes in the legal framework and/or regulatory requirements for the Fund's Management Company. In the event of the realisation of collateral, legal risks may also arise from the relevant insolvency law.

1.6.9 Sustainability risks

Sustainability risks may be environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment.

**1.7 Risk management procedure**

The Management Company will apply a risk management procedure for the Fund and each sub-fund in compliance

with the UCI Act and other applicable provisions, in particular CSSF Circular 11/512. As part of the risk management procedure, the overall risk of the sub-fund is measured and monitored using the commitment approach. This approach entails converting positions in derivative financial instruments into the corresponding underlying positions.

**1.8 Historical performance**

For the historical performance of the sub-funds, see the Key Investor Information Documents ( "KIID" ).

**2 Investment objective and investment policy**

**2.1 Investment objective**

The Fund aims to achieve long-term capital growth combined with an appropriate return.

In pursuit of this objective, at least 80% of the net assets of a sub-fund (with the exception of the sub-fund Swisscanto (LU) Equity Fund Sustainable) will be invested in accordance with the principle of risk diversification in equity securities and participation rights from the investment universe described in greater detail below. For the sub-fund Swisscanto (LU) Equity Fund Sustainable, the investment restrictions cited in the specific sub-fund investment policy in section 2.2.9. are applied in pursuit of this objective.

In addition, at least 51% of the assets of the sub-fund will be invested in equity securities and participation rights within the meaning of German tax law; both direct investments in equity securities and participation rights and eligible investments in target funds will count towards this percentage. The eligible portion of target fund investments is calculated by multiplying the net asset value of the target fund units held by the equity interest of the same target fund, using the figure published for the target fund by WM Datenservice or another data source.

The objective of sub-funds with "Sustainable" in the name is to invest in sustainable assets.

The investment objective of sub-funds with the word "Responsible" in their name is non-sustainable investment within the meaning of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter "SFDR" ).

**2.2 Sub-fund-specific investment policy**

## 2.2.0 General information

In addition to the investments in equity securities and participation rights mentioned under section 2.1, each sub-fund may invest in interest-bearing securities and money market instruments as well as all other investments mentioned under section 2.3.1.

### *Ownership rights*

Equity securities and participation rights are not only investments in shares but also in REITs<sup>2</sup> (Real Estate Investment Trusts) and other equity interests (cooperative society shares, non-voting stock, participation certificates, equity funds (taking account of the restrictions listed in section 2.3), certificates on equity securities, equity indices, etc. (provided these certificates are issued by first-class financial institutions and have the characteristics of a security as defined in Article 41(1)(a) to (d) of the UCI Act) and similar), as well as securities and rights which embody the right to acquire equity securities and participation rights by subscription or exchange, in particular warrants.

### *Interest-bearing securities*

Interest-bearing securities and money market instruments are bonds, notes, convertible bonds, convertible notes, bonds-cum-warrants and warrants on securities, bond and money market funds, as well as certificates on interest-bearing securities and money market instruments, bond indices, etc. (provided these certificates are issued by first-class financial institutions and have the characteristics of a security as defined in Article 41 (1) a) to d) of the UCI Act) and similar.

A sub-fund may also invest in Delta-1 Certificates on other permitted underlyings (e.g. EU emission allowances) provided that the criteria of transferable securities within the meaning of Article 2 (1) c) of the Grand-Ducal Regulation of 8 February 2008 are met for the Delta-1 Certificates.

### *Cash and other liquid assets*

In addition, each sub-fund may hold up to 20% in cash and other liquid assets. For further information, please refer to section 2.3.1 h) and section 2.3.2 o) regarding restrictions on the use of cash and other liquid assets.

### *Use of derivatives*

The sub-funds use derivatives for hedging purposes and for efficiently implementing the portfolio strategy.

### *Geographical designation*

Sub-funds with a geographical designation in their name invest at least two thirds of their total assets in companies which have their registered office or conduct the majority of their business operations in the geographical region referred to in their name.

### *Systematic approach*

For sub-funds with "Systematic" in their name, the selection of securities in the universe is based on an in-house qualitative model. Shares are valued using various factors (e.g. valuation, momentum and business stability). Taking into account additional conditions such as carbon footprint reduction and certain restrictions on sector, country and securities, the weightings for individual shares are determined using a risk optimisation approach to ensure that the risk/reward ratio is as high as possible.

## 2.2.1 Sustainability policy

### *Responsible approach*

For sub-funds with "Responsible" in the name, one of the approaches followed by the asset manager is to integrate the specific aspects of environmental, social and governance ( "ESG" ) issues into the investment process. This means that business sustainability criteria are systematically considered during the investment selection process.

The asset manager uses third-party data and proprietary qualitative and quantitative research in this process. The asset manager also uses this analyses to anticipate developments in the area of sustainability and take investment decisions on this basis.

Given that (i) a progressive approach to sustainability criteria can have a positive impact and (ii) sustainability risks may have a negative impact on returns, the aim of this procedure is to quantify ESG opportunities and ESG risks in order to be able to take account of these in the investment process.

A sustainability approach also includes the definition of exclusions for business activities that the asset manager judges to be particularly risky from a sustainability perspective, including, for example, the securities of companies connected to the manufacture of controversial weapons.

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<sup>2</sup> These are closed or open-ended funds pursuant to Article 41(1)(e) of the UCI Act or listed companies pursuant to Article 41(1)(a) to (d) of the UCI Act.

The exclusions are updated on an ongoing basis to reflect new circumstances and information.

In principle, the approach ensures that investments are not made in companies that do not have good corporate governance procedures.

In addition, the asset manager focuses its investment activity on reducing greenhouse gases, with the aim of making a material contribution to mitigating climate change. Greenhouse gases are measured based on their relative global warming potential as the carbon dioxide equivalent (CO<sub>2</sub>e).

Sub-funds that implement the responsible approach may invest in sustainable investments within the meaning of Article 2 (17) of Regulation (EU) 2019/2088.

They also consider principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators from Annex 1 of Regulation (EU) 2019/2088 are used for this purpose. Any relevant information in this respect shall be disclosed in the annual report.

The reference values listed in the table under 2.2.15 are not for sustainable investments. However, the asset manager selects from the investment universe the securities that fulfil the requirements.

The sub-funds that follow the responsible approach fall within Article 8 of the SFDR. Further details on the implementation of the approach can be found in the respective sub-fund annex to the Sales Prospectus.

#### Sustainable approach

For sub-funds with "Sustainable" in their name, the asset manager's investment activity is focused on reducing the CO<sub>2</sub>e intensity of investments within the meaning of Article 9(3) of Regulation (EU) 2019/2088.

In addition, the asset manager uses its analysis to focus on securities which, according to its assessment, are expected to make a positive contribution to the fulfilment of the UN Sustainable Development Goals (SDGs) and qualify as sustainable investments within the meaning of Article 9 (2) of Regulation (EU) 2019/2088. A positive impact on the SDGs means that, for example, a company is offering products and/or services that contribute to the achievement of the 17 SDGs.

In addition, the objective of the asset manager is to invest only in securities that it considers to be above-average with regards to sustainable business criteria ("ESG", criteria).

This assessment reflects the specific aspects of environmental, social and governance ("ESG") issues and systematically includes these in the investment selection process.

The asset manager bases the assessment on third-party data and proprietary qualitative and quantitative research.

Given that (i) a progressive approach to sustainability criteria can have a positive impact and (ii) sustainability risks may

have a negative impact on returns, the aim of this procedure is to quantify ESG opportunities and ESG risks in order to be able to take account of these in the investment process.

In principle, the approach ensures that investments are not made in companies that do not have good corporate governance procedures.

In addition, comprehensive exclusions are defined for business activities that the asset manager assesses as risky from a sustainability perspective.

The exclusions are updated on an ongoing basis to reflect new circumstances and information.

Sub-funds that implement a sustainable approach also consider principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators from Annex 1 of Regulation (EU) 2019/2088 are used for this purpose. Any relevant information in this respect shall be disclosed in the annual report.

The reference values listed in the table under 2.2.15 are not for sustainable investments. The asset manager selects from the investment universe the securities that fulfil the requirements of the sustainable approach.

The sub-funds that follow this approach fall within Article 9 of the SFDR. Further details on the implementation of the approach can be found in the respective sub-fund annex to the Sales Prospectus.

Further information on the product-related sustainability policy can be found on the website of the relevant sub-fund: <https://products.swisscanto.com/products>.

#### 2.2.2 Swisscanto (LU) Equity Fund Systematic Responsible Selection International

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies worldwide.

#### 2.2.3 Swisscanto (LU) Equity Fund Small & Mid Caps Japan

The sub-fund assets will be invested in an investment universe dedicated to small and mid cap companies which have their registered office or conduct the majority of their business operations in the geographical region referred to in the name of the sub-fund. The market capitalisation of the undertakings may not exceed 2% of the market capitalisation of the corresponding market as a whole.

The sub-fund takes account of environment, social and governance considerations. The environmental and/or social priorities pursued by the sub-fund include a reduction in the CO<sub>2</sub> footprint compared to the reference value. When identifying investments that enable the sub-fund to take account of environmental or social considerations, the asset manager applies an exclusion policy and also takes account of environmental, social and governance (ESG) criteria.

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These factors are incorporated into the investment process. The asset manager uses third-party data and proprietary qualitative and quantitative research in this process.

Referring to third party providers' governance ratings for the relevant issuers as well as its own analysis, the Asset Manager also assesses issuers' corporate governance practices. This ensures that the relevant issuers engage in good corporate governance practices, in particular with regard to sound management structures, good employee relations, reasonable employee remuneration and compliance with tax law.

The benchmark indices listed in the table under 2.2.15 are not for sustainable investments. However, the Asset Manager selects from the investment universe the securities that fulfil the requirements.

The management of sustainability risks is part of the due diligence process conducted by the Asset Manager of this sub-fund. When assessing the sustainability risks associated with the underlying assets, it assesses the risk that the value of these investments could be negatively affected by an event with environmental, social or governance aspects. Sustainability risks are identified, monitored and managed as follows according to both quantitative and qualitative processes: (1) Potential investments are examined for sustainability risks before investing in order to establish whether they are susceptible to these risks. This process involves both the application of an exclusion policy under which potential investments are removed from the investment universe as well as positive screening under which investments with a low sustainability risk that also have good financial performance are incorporated into the investment universe; and (2) as long as the investment is maintained, sustainability risks are monitored through a review of issuers (where relevant) or ESG data published by selected data providers in order to establish whether the level of sustainability risks has changed since the original assessment. If the sustainability risks associated with a particular investment exceed the sub-fund's ESG tolerance for risk, the Asset Manager will consider selling or reducing the sub-fund's commitment to the investment concerned, taking account of investors' best interests.

The Sub-fund also considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators from Annex 1 of Regulation (EU) 2019/2088 are used for this purpose. Any relevant information in this respect shall be disclosed in the annual report.

The sub-fund falls under Article 8 SFDR. Further details on the implementation of the approach can be found in the respective sub-fund annex to the Sales Prospectus.

Further information on the product-related sustainability policy can be found on the website for the sub-fund Swisscanto (LU) Equity Fund Small & Mid Caps Japan: <https://products.swisscanto.com/products>.

#### 2.2.4 Swisscanto (LU) Equity Fund Responsible Europe Top Dividend

The sub-fund assets will be invested in an investment universe dedicated to companies with a high dividend yield and which have their registered office or conduct the majority of their business operations in the geographical region referred to in the name of the sub-fund.

#### 2.2.5 Swisscanto (LU) Equity Fund Sustainable Global Climate

The sub-fund assets will be invested in an investment universe dedicated to companies worldwide which make a contribution to reducing climate change or the consequences thereof.

#### 2.2.6 Swisscanto (LU) Equity Fund Sustainable Global Water

The sub-fund assets will be invested in an investment universe dedicated to companies from all over the world which offer technology, products or services related to the water supply chain. In particular, companies in the water supply, water technology, water treatment, water services, water purification and water recycling segments will be targeted.

#### 2.2.7 Swisscanto (LU) Equity Fund Responsible Global Innovation Leaders

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies worldwide and from a wide range of sectors. The sub-fund's investments focus primarily on companies with full-scale research and development operations, which give the companies the potential for growth and future product innovation.

#### 2.2.8 Swisscanto (LU) Equity Fund Sustainable

At least 85% of the sub-fund assets will be invested in shares and other equity securities and participation rights of companies worldwide. A maximum of 15% of the sub-fund assets may be invested in fixed and floating-rate securities and money market instruments and liquidity.

#### 2.2.9 Swisscanto (LU) Equity Fund Systematic Responsible Eurozone

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies which have their registered office or conduct the majority of their business operations in the eurozone.

#### 2.2.10 Swisscanto (LU) Equity Fund Systematic Responsible Japan

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies which have their registered office or conduct the majority of their business operations in Japan.

#### 2.2.11 Swisscanto (LU) Equity Fund Systematic Responsible Emerging Markets

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies which have their registered office or conduct the majority of their business operations in emerging markets.

#### 2.2.12 Swisscanto (LU) Equity Fund Systematic Responsible USA

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies which have their registered office or conduct the majority of their business operations in the US.

#### 2.2.13 Swisscanto (LU) Equity Fund Systematic Responsible Global

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies worldwide.

#### 2.2.14 Swisscanto (LU) Equity Fund Sustainable Europe

The sub-fund assets will be invested in shares and other equity securities and participation rights of companies which have their registered office or conduct the majority of their business operations in Europe.

#### 2.2.15 Information on the benchmark indices

##### a) Administrators of the benchmark indices

Pursuant to Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the "Benchmark Regulation"), benchmark administrators must appear in the Register of administrators and benchmarks maintained by ESMA in accordance with Article 36 of the Benchmark Regulation. The benchmark indices cited in this Sales Prospectus are managed by authorised or registered administrators.

##### b) Use of benchmark indices within the investment policy

The securities in the sub-funds listed in the following table are selected on a discretionary basis using a consistent investment process ("active management").

When composing the portfolios of the individual sub-funds, the selection and weighting of securities is focussed on companies included in the benchmark indices cited in the table. The extent of deviation from these benchmark indices is also shown in the table.

The investment policy of these sub-funds is guided by and aims to outperform the listed benchmark indices. Based on the market situation and risk assessments, the asset manager may at any time actively over- or underweight individual securities or sectors to a greater or lesser extent, deviating in both directions from the relevant benchmark indices.

##### c) Use of an internal procedure in the event of the discontinuation of the benchmark index, or material changes thereto

If a benchmark index is no longer provided by the administrator or is subject to material changes, the Management Company has developed a protocol enabling it to maintain the sub-fund's investment policy, continuing without a benchmark index until a switch to another suitable benchmark index can be made. The protocol is available free of charge from the Management Company and can be requested in paper or electronic format.

	Sub-fund name	Benchmark index <sup>3</sup>	Deviation from the benchmark index
1.	Swisscanto (LU) Equity Fund Sustainable Global Climate	• MSCI World TR Net	significant
2.	Swisscanto (LU) Equity Fund Responsible Global Innovation Leaders	• MSCI World TR Net	material
3.	Swisscanto (LU) Equity Fund Sustainable Global Water	• MSCI World TR Net	significant
4.	Swisscanto (LU) Equity Fund Systematic Responsible Selection International	• MSCI World TR Net	material
5.	Swisscanto (LU) Equity Fund Systematic Responsible USA	• MSCI USA TR Net	moderate
6.	Swisscanto (LU) Equity Fund Sustainable	• MSCI World TR Net	material
7.	Swisscanto (LU) Equity Fund Systematic Responsible Emerging Markets	• MSCI Emerging Markets TR Net	moderate
8.	Swisscanto (LU) Equity Fund Systematic Responsible Eurozone	• MSCI EMU TR Net	moderate
9.	Swisscanto (LU) Equity Fund Systematic Responsible Global	• MSCI World TR Net	moderate
10.	Swisscanto (LU) Equity Fund Systematic Responsible Japan	• MSCI® Japan TR Net	moderate
11.	Swisscanto (LU) Equity Fund Responsible Europe Top Dividend	• MSCI Europe TR Net	material
12.	Swisscanto (LU) Equity Fund Small & Mid Caps Japan	• 50% Topix 400 Mid Cap • 50% Topix Small Cap EUR	significant
13.	Swisscanto (LU) Equity Fund Sustainable Europe	• MSCI Europe TR Net	material

<sup>3</sup> The benchmark index may be currency-hedged depending on the unit class currency.

## 2.3 Provisions applicable to all sub-funds

### 2.3.1 Authorised investments are:

#### a) Securities and money market instruments

The Fund may invest in securities and money market instruments that are admitted to trading on a regulated market within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments (MiFID II), or that are traded on another recognised and regulated market that operates regularly and is open to the public in a member state of the European Union (EU) or a state in Europe, Africa, Asia, Oceania or America.

#### b) New issues

The Fund may invest in securities and money market instruments originating from new issues provided the conditions of issue include the obligation to apply for official listing on a stock exchange or other recognised and regulated market that operates regularly and is open to the public in a member state of the EU or a state in Europe, Africa, Asia, Oceania or America, and provided admission to trading takes place within one year of issue.

#### c) Money market instruments (unlisted)

The Fund may invest in money market instruments which are not traded on a stock exchange or on another regulated market provided their issue or their issuers are subject to investment and investor protection regulations, on condition that these money market instruments satisfy the conditions laid down in Article 41 (1) h) of the UCI Act.

#### d) Liquidity

The Fund may invest in demand deposits and time deposits. These are deposits with credit institutions domiciled in an EU member state or in a non-EU member state that can be terminated at any time or within a period of no more than 12 months. In the case of credit institutions domiciled in non-EU member states, investments are only permitted if these credit institutions are subject to supervisory regulations which are equivalent to those under EU law.

#### e) Investments in fund units

The Fund may invest in units of UCITS of the open-ended type and/or in other undertakings for collective investment (other UCIs) within the meaning of the UCI Act. Investments in such funds are permissible only

if they are domiciled in a member state of the EU or in a third country, provided that:

- such other UCIs have been approved in accordance with legislation subjecting them to prudential supervision that, in the opinion of the CSSF, is equivalent to that which applies under EU law, and that adequate provision exists for ensuring cooperation between authorities;
- the level of protection afforded to unitholders in other UCIs is equivalent to that afforded to unitholders in a UCITS and, in particular, the rules governing the separate safekeeping of Fund assets, borrowing, lending and the short-selling of securities and money market instruments are equivalent to the requirements laid down in Directive 2009/65/EC;
- the business operations of such other UCIs are reported in semi-annual and annual reports to enable an assessment to be made of the assets and liabilities, income and transactions during the reporting period;
- the UCITS or the other UCIs in which units are to be acquired may not be permitted, under the terms of their founding documents, to invest more than 10% of their fund assets in the units of other UCITS or UCIs.

The Fund may acquire units in UCITS or other UCIs that are managed directly or indirectly by the Management Company itself or by a company with which it is affiliated by way of common management or control or by way of a direct or indirect stake of more than 10% of the capital or votes.

The Management Company and the other company may not charge any issue or redemption fees in this regard.

#### f) Derivative financial instruments ( "derivatives" )

The Fund may invest in derivative financial instruments ( "derivatives" ), including equivalent cash-settled instruments that are traded on one of the regulated markets described above and/or derivative financial instruments that are not traded on a stock exchange ( "OTC derivatives" ), provided that:

- the underlyings are instruments as defined in Article 41(1) of the UCI Act, financial indices, interest rates, exchange rates or currencies in which the UCITS may invest in accordance with the investment objectives stated in its founding documents;
  - the counterparties in OTC derivatives transactions are institutions subject to prudential supervision in one of the categories authorised by the CSSF; and
  - the OTC derivatives are reliably and verifiably valued on a daily basis and can be sold, liquidated or closed out by a countertrade at the initiative of the UCITS at any time at fair value.
- g) Other investments  
The Fund may, in compliance with the investment restrictions, invest in other securities or money market instruments than the aforementioned permissible securities or money market instruments.
- h) Cash and other liquid assets  
Cash and other liquid assets should be limited to demand deposits, such as cash (i) available at any time to make current or extraordinary payments or (ii) for the period necessary to reinvest in eligible assets in accordance with Article 41(1) of the UCI Law or (iii) for a period during which adverse market conditions prevail.

### 2.3.2 Investment restrictions

The following rules must be observed for sub-fund investments:

- a) For the entirety of the managed assets, a sub-fund may not acquire more than 10% of the outstanding securities or money market instruments or more than 10% of the non-voting stock of any single issuer. It may not hold more than 25% of the units in the same UCITS or other UCIs.
- b) Subject to the exceptions mentioned explicitly, no more than 10% of the net assets of a sub-fund may be invested in securities and money market instruments from the same issuer. The total volume of the securities and money market instruments from issuers in which more than 5% of net assets is invested may not exceed 40% of the net assets of any sub-fund.
- c) Investments must not confer rights on the Management Company that enable it to exert significant influence over an issuer's operations.
- d) Furthermore, the restrictions stipulated under a) and c) do not apply to equity securities and participation rights that allow the sub-fund to participate in the capital of a company that is registered in a state outside the EU and invests its assets principally in the securities of issuers registered in that state if, according to the laws of that state, that issuer represents the only medium for investment in securities of issuers in that state. However, this exception applies only if the company registered outside the EU observes the investment restrictions of the sub-fund in question in its own investment policy.
- e) A maximum of 20% of the net assets of a sub-fund may be invested in deposits with a single institution.
- f) The overall risk arising from the use of derivative financial instruments may not exceed 100% of the net assets of a sub-fund and therefore the overall risk of the sub-fund may not exceed a total of 200% of the net assets of a sub-fund on a lasting basis. Temporary borrowing may not increase the overall risk of the sub-fund by more than 10%, meaning that the overall risk may never amount to more than 210% of the net assets of a sub-fund. With regard to investments in derivative financial instruments, the overall risk of the corresponding underlyings, provided they are not index-based derivatives, may not exceed the limits given under b), e), g) and h).
- g) In the case of transactions involving OTC derivatives and/or techniques for the efficient management of the portfolio, e.g. securities lending, the risk exposure per counterparty may not exceed 10% of the net assets of a sub-fund where the counterparty is a credit institution pursuant to the UCI Act. In all other cases, the risk per counterparty may not exceed 5% of the net assets of a sub-fund.
- h) Notwithstanding the upper limits laid down in b) first sentence and e) and g), each sub-fund may invest with one and the same institution a maximum of 20% of its net assets in a combination of
- securities and money market instruments issued by this institution,
  - deposits with this institution and/or
  - risks arising from transactions in OTC derivatives acquired from this institution and/or involving techniques for the efficient management of the portfolio.



- i) A maximum of 10% of the net assets of a sub-fund may be invested in units of other UCITS and/or UCIs as described in section 2.3.1 e). However, this restriction does not apply for Swisscanto (LU) Equity Fund Systematic Responsible Global.
- j) In the case of sub-funds with distribution units outstanding, a maximum of 15% and, in the case of sub-funds with only accumulation units outstanding, a maximum of 20% of the net assets of a sub-fund may be invested in demand and time deposits as described in section 2.3.1 d).
- k) In the case of sub-funds with distribution units outstanding, a maximum of 15% and, in the case of sub-funds with only accumulation units outstanding, a maximum of 20% of the net assets may be invested in interest-bearing securities and money market instruments.
- l) In total, in the case of sub-funds with distribution units outstanding, a maximum of 15% of the net assets may be invested in interest-bearing instruments (receivables within the meaning of the EU Savings Directive (2003/48/EC)).
- m) A maximum of 10% of a sub-fund's net assets may be invested in other investments as described in section 2.3.1 g).
- o) Cash and liquid assets in the form of demand deposits within the meaning of sub-section 2.3.1 h) are limited to 20% of the net assets of the respective sub-fund. These restrictions may only be exceeded temporarily and for as long as strictly necessary on account of exceptionally unfavourable market conditions and if such excess is justified with regard to the interests of the unitholders.
- p) Investments in Delta-1 certificates whose underlying assets are EU emission allowances or similar emission certificates are limited to 5% of the net assets of the respective sub-fund. Such investments are excluded in the case of the Swisscanto (LU) Equity Fund Small & Mid Caps Japan sub-fund.

Should the limits laid down in section 2.3.2 be exceeded unintentionally, priority must be given to bringing investments down to below the set percentages while safeguarding the interests of unitholders.

Unless it is stated specifically that they relate to the assets of the Fund in their entirety, the percentage restrictions stated above refer to the assets of each individual sub-fund. These restrictions do not apply in the event that subscription rights are exercised.

Irrespective of their obligation to ensure compliance with the principle of risk diversification, newly authorised sub-funds may deviate from the investment restrictions for a period of six months following their authorisation.

### 2.3.3 Unauthorised investments

The Fund may not:

- a) grant loans or act as guarantor for third parties;
- b) invest directly in real estate, commodities and commodity papers;
- c) short-sell securities.

The Management Company may determine further investment restrictions at any time in the interests of the unitholders, provided such restrictions are necessary to comply with the laws and regulations of the countries in which the Fund's unit certificates are offered and sold.

### 2.3.4 Investment techniques and instruments

#### a) Repos

The Management Company does not enter into securities repurchase agreements.

#### b) Loans

In principle, the Fund may not take out loans or temporarily overdraw its accounts. However, a sub-fund may take out loans for the purchase of foreign currencies in the form of a back-to-back loan or temporarily borrow up to 10% of the net assets.

#### c) Long/short strategy

In addition, the Asset Manager may seek to optimize sub-fund portfolio returns by building up additional long and short positions. The sub-funds will take additional long positions in equity securities and participation rights which are the economic equivalent of a direct investment of a maximum of 30% of the net assets using derivative financial instruments (e.g. in the form of equity swaps), while also taking additional equivalent short positions in equity securities and participation rights which are overvalued in the Asset Manager's view, also using derivative financial instruments. However, in accordance with section 2.3.3, the Fund will not engage in the short-selling of securities.

d) Use of structured financial instruments

Within the scope of the investment policy, sub-funds may invest in structured products (certificates), provided such instruments can be used in an efficient manner to achieve the desired investment objective. At all times, certificates must be disposable directly and without restriction. Furthermore, such transactions are permitted only with first-class financial institutions specialising in these types of transactions.

Derivative financial instruments may be used for the following purposes in particular:

d1) Managing currency exposure

Sub-funds may both hedge and actively manage their currency exposure through the use of currency forwards and currency swaps.

A sub-fund may also enter into a desired currency exposure in a currency permitted in the individual fund's investment policy by means of a currency link to a financial instrument via the use of currency forwards and currency swaps. In such cases the currency exposure does not necessarily have to be built up in the Fund's currency of investment or account. Instead it can be achieved in a chosen, permitted investment currency of the Fund.

d2) Managing interest rate, currency and credit risks

In addition to the above transactions, each sub-fund may enter into futures and options transactions as well as swap transactions (interest rate swaps and combined interest rate and currency swaps as well as total return swaps), both for hedging purposes and for efficient portfolio management.

d3) Use of total return swaps

Total return swaps may be conducted for each sub-fund for the purposes of efficient portfolio management. Between 30% and 60% of the assets of the relevant sub-fund would normally be covered by total return swaps. However, the Management Company reserves the right to transfer up to 100% of the assets held in the relevant sub-fund into a total return swap, depending on market conditions, with the aim of efficient portfolio management in the interests of investors. Both positive and negative income from total return swaps are fully taken into account in the fund assets.

d4) Efficient implementation of the investment policy

e) Joint management of assets

For the purpose of efficient management of the Fund, and to the extent permitted by the investment policy, the Management Company may decide to jointly manage the assets or portions of the assets of certain sub-funds. Such jointly managed assets shall hereinafter be referred to as a "pool", regardless of the fact that such pools are only combined for internal management purposes. The pools do not constitute a separate legal entity from the jointly managed sub-funds and investors have no direct access to them. Each individual jointly managed sub-fund retains the right to its specific assets. The jointly managed assets in the pools can be separated at any time and transferred to the individual participating sub-funds. If the assets of more than one sub-fund are merged for the purpose of joint management, the portion of the assets in the pool attributable to each of the participating sub-funds shall be recorded in writing with reference to the initial participation of the sub-fund in that pool. The rights of each participating sub-fund to the jointly managed assets relate to each individual position in that pool. Additional investments made for the jointly managed sub-funds shall be allocated to these sub-funds in accordance with their rights, while assets sold shall be deducted in the same way from the assets attributable to each participating sub-fund.

f) Within the scope of the investment policy, the Board of Directors may pledge a sub-fund's assets or transfer ownership thereof as collateral in connection with transactions involving derivative financial instruments.

g) Securities lending

g1)

With a view to the efficient management of assets and for the purpose of generating additional income, a sub-fund may, in compliance with the pertinent legal provisions, employ securities lending techniques and instruments

- provided they are permitted under Article 42(2) of the UCI Act and Article 11 of Directive 2007/16/EC of 19 March 2007 (Eligible Assets Directive).
- Generating additional income is possible and
- depends on current market conditions.

g2) When engaging in securities lending transactions, the sub-fund acts as lender, in which capacity it surrenders a security to the borrower, which the latter may dispose of for a limited period and for which the sub-fund receives a fee.

g2.1) Principal

Zürcher Kantonalbank shall be the sole direct borrower (principal) and the sole direct counterparty for securities lending transactions. As an independent public-law institution of the Canton of Zurich, it holds an unlimited state guarantee. As such, it is subject to prudential supervision by the Swiss Financial Market Supervisory Authority (FINMA), whose rules are recognised by the CSSF as equivalent to those enshrined in EU law.

g2.2) Agent

RBC Investor Services Bank S.A. has been appointed agent for securities financing transactions. The agent is responsible for the operational aspects of the loan, the recovery of the security and the distribution of income to the sub-funds. In addition, the agent ensures that the amount of the collateral is adequate after the valuation discount and is in accordance with the admissibility criteria.

g3) Securities lending may not result in a change in the investment objective, nor may it entail substantial additional risks as compared with the original risk strategy.

The risks to which securities lending exposes a sub-fund shall be appropriately addressed by the risk management procedure. A detailed overview of the risks can be found in section 1.6.7 "Risks associated with securities lending" of this Sales Prospectus.

g4) The Management Company will not accrue any income from securities lending transactions. All proceeds from securities lending shall be credited to the sub-fund involved in this securities lending less the fee paid to the agent for its securities lending services.

91% of the gross income generated by the securities financing business goes into the fund assets. The agent receives the remaining 9%.

g5) All securities transferred under a securities lending transaction may be transferred back at any time and all securities lending agreements may be terminated

at any time. Securities lending transactions shall be factored into the risk management procedure for liquidity risks in order to ensure that a sub-fund can meet its redemption obligations at all times.

g6) Exceptionally, as high as 60% of the assets of a sub-fund may be used for securities lending, depending on the respective market conditions, the objective of efficient portfolio management and in the interests of investors. It is expected that up to 15% of the assets of each sub-fund may be used for this purpose. The actual value of the securities lending invested in the Fund's assets can be found in the latest annual report (or semi-annual report).

h) Collateral management

h1) The risk positions that arise for a counterparty as a consequence of transactions involving OTC derivatives and techniques for efficient portfolio management will be combined for the purpose of calculating the thresholds of counterparty risk exposure as set out in Article 43 of the UCI Act.

h2) If a sub-fund engages in transactions in OTC derivatives and uses techniques for efficient portfolio management, counterparty risk exposure may, in accordance with ESMA/2014/937 (Guidelines on ETFs and other UCITS issues) and ESMA's CESR/10-788 (CESR's Guidelines on Risk Measurement and the Calculation of Global Exposure and Counterparty Risk for UCITS), be reduced by accepting collateral insofar as it satisfies the following criteria. The same criteria apply to collateral received in connection with securities lending, unless otherwise stated.

h2.1) The following assets are accepted as eligible collateral:

- Cash and sight deposits, with the exception of securities lending, which are denominated in USD, EUR or CHF or the reference currency of a sub-fund and are deposited with legal entities pursuant to Article 50(f) of the UCITS Directive;
- Highly liquid bonds issued by issuers with a high credit rating, which enjoy brisk trading on a regulated market with transparent pricing, in order that they can be sold at short notice with no loss of liquidity. Moreover, the collateral must be valued at least once on every trading day. The term of

the bonds is limited to a maximum of 20 years;

- Shares traded on a regulated market in a member state of the EU or on a stock exchange in an OECD member state and from issuers from these countries. In addition, these shares must enjoy brisk trading, with transparent pricing and high liquidity assured.

#### h2.2) Valuation of collateral

Collateral in the form of securities is valued at least once daily at the last known market price and in accordance with standard market practice. The exchange on which the securities are listed and which is the main market for this security is used for the valuation.

#### h2.3) Safekeeping of collateral

The collateral received is held by the Depositary and its sub-depositaries on accounts separate from the assets. In the case of securities lending, the Depositary shall transfer the custody of the collateral to the agent, which may also use its sub-depositaries for this purpose.

#### h2.4) Cash collateral

Cash collateral accepted may only be invested in high-quality government bonds or in short-dated money market funds in accordance with the definition in the CESR's Guidelines.

By reinvesting cash collateral, a sub-fund is also exposed to the interest rate, credit and liquidity risks attached to the respective government bonds or money market funds, which may manifest should the counterparty default or be in arrears.

In the case of securities lending, cash collateral or sight deposits are not considered collateral, which excludes reinvestment in this regard.

#### h2.5) Correlation

The collateral accepted by the sub-fund must be issued by a legal entity which is independent of the counterparty and has no high correlation with the performance of the counterparty.

#### h2.6) Diversification of collateral

Collateral must be suitably diversified in terms of countries, markets and issuers. The criterion

of suitable diversification is deemed to be satisfied in respect of issuer concentration if the sub-fund receives from the counterparty to the securities lending transaction and/or OTC derivatives transactions a collateral basket for which the maximum exposure to any particular issuer is 20% of the net asset value.

h2.7) Operational and legal risks in connection with collateral management must be calculated, controlled and reduced through the risk management process.

h2.8) In cases involving transfers of rights, the collateral accepted must be held in safekeeping by the sub-fund's Depositary. Under other types of collateral agreements, the collateral may be held by a third party which is subject to supervision and is not in any way connected with the provider of the collateral.

h2.9) The sub-fund may realise accepted collateral at any time without conferring with the counterparty or requiring the latter's approval.

#### h3) Haircut strategy

The Management Company has defined a strategy for imposing appropriate, conservative discounts on the collateral received ( "haircut strategy" ).

The valuation discounts on collateral results in cover of more than 100%. This takes account of the fact that the valuation of the collateral or the liquidity profile of this asset changes daily. The adjusted collateral valuation achieved with the haircut may at no time fall below the Fund's counterparty exposure.

The haircut strategy factors in the characteristics of the collateral, the nature and credit rating of the issuer of the collateral, the price volatility of the collateral, the currency and the results of possible stress tests that can be run on the collateral. If a sub-fund accepts collateral for at least 30% of its assets, it is required to have a suitable stress test strategy in place in order to ensure that said sub-fund can, in normal as well as extraordinary liquidity conditions, assess the liquidity risk associated with this collateral.

Owing to the different price volatilities, the haircuts on bonds are graded according to rating class. The

bandwidth for haircuts on bonds is between 3% and 7%, and haircuts on shares amount to at least 12%.

The appropriateness of the haircuts applied is reviewed at regular intervals, but no less than once a year, and the haircuts are adjusted accordingly if required. In the event of significant changes in the markets, haircuts will be reviewed immediately.

### **3 Participation in the Fund**

#### **3.1 Conditions for the issue, redemption and conversion of units**

Units in a sub-fund are issued or redeemed on each bank business day in Luxembourg. A “bank business day” is any normal bank business day (i.e. days on which the banks are open during normal business hours in Luxembourg) with the exception of individual non-statutory holidays in Luxembourg. “Non-statutory holidays” are days on which banks and financial institutions are closed. Units are not issued or redeemed on days on which the exchanges of the main countries in which the sub-funds invest are closed, or if the sub-funds’ assets cannot be properly valued. No issues or redemptions take place on days on which the Management Company has decided not to calculate the net asset value as described in section 3.6.

The Management Company is entitled at its own discretion within the scope of its distribution activities to reject subscription orders and to temporarily or permanently suspend or limit the sale of units to natural persons or legal entities in certain countries or regions, or to permit subscriptions for specific sums of money. The Management Company may also repossess units at any time if they are in the possession of unitholders who are not permitted to acquire or hold units or particular classes of units.

The Management Company does not permit any market timing or activities which might be deemed equivalent to market timing. It reserves the right to refuse subscription and conversion orders from an investor whom the Management Company suspects of engaging in such activities, as well as to take the necessary steps in order to protect the other investors in the Fund.

The Management Company reserves the right to unilaterally redeem units against payment of the corresponding redemption price if this is deemed necessary – taking into account interests of the unitholders or a sub-fund that are worthy of protection (e.g. if the risk of tax or regulatory

disadvantages for the Fund or the unitholders can be eliminated or reduced by the redemption).

Units are issued, redeemed and converted on the basis of orders received by the Depositary during usual local business hours but by no later than 15:00 Luxembourg time on a Luxembourg bank business day (order date).

For the Swisscanto (LU) Equity Fund Systematic Responsible Global sub-fund, units are issued, redeemed and converted on the basis of orders received by the Depositary no later than 12:00 Luxembourg time on a Luxembourg bank business day (order date).

The net asset value used for the calculation of the issue, redemption and conversion price is calculated on the following valuation day on the basis of the last known prices.

For the sub-funds Swisscanto (LU) Equity Fund Systematic Responsible Global, Swisscanto (LU) Equity Fund Systematic Responsible Japan and Swisscanto (LU) Equity Fund Systematic Responsible Emerging Markets, the net asset value used for the calculation of the issue, redemption and conversion price is calculated on the day after the following valuation day on the basis of the last known prices. Orders received after such time will be treated in the same way as those received on the following bank business day.

Subscriptions, redemptions and conversions are therefore effected on the basis of an unknown net asset value (forward pricing).

The individual valuation principles are described in the following paragraph.

#### **3.2 Net asset value, issue, redemption and conversion prices, partial swinging single pricing**

In accordance with the Management Regulations and in accordance with section 3.1, the net asset value (NAV) of the units is calculated by the Management Company for each separate sub-fund or unit class on each bank business day in Luxembourg.

The net asset value of a unit in a sub-fund or of a unit class or currency class is – unless stated otherwise in this Sales Prospectus – expressed in the sub-fund’ s currency of account or the currency of the currency class and is calculated by dividing the net assets of the sub-fund or the unit class by the number of units of that sub-fund or unit class in circulation. The net asset value is rounded to the nearest 0.01 of the unit of account or, in the case of the sub-

funds Swisscanto (LU) Equity Fund Small & Mid Caps Japan and Swisscanto (LU) Equity Fund Systematic Responsible Japan, to 1 yen.

The net assets of a given sub-fund or unit class correspond to the difference between the total assets of that sub-fund or unit class and the total liabilities that are attributable to it.

The total net assets of the Fund are expressed in euro and correspond to the difference between the total assets of the Fund and its total liabilities. For the purpose of this calculation, the net assets of each sub-fund are converted into euro, if they are not already expressed in euro, and totalled.

Distributions in favour of the distribution units have the effect of reducing the net asset value of the distribution units by the amount distributed. By contrast, the net asset value of accumulation units remains unaffected by this process.

The assets of each sub-fund or unit class are valued as follows:

a) Securities, derivatives and other investments listed on a stock exchange are valued at the latest available prices. If these securities, derivatives and other investments are listed on several exchanges, the latest available price on the exchange that represents the primary market for this security shall apply.

In the case of securities, derivatives and other investments not commonly traded on an exchange and for which a secondary market among securities traders exists with market-compliant price discovery, the Management Company may value these securities, derivatives and other investments based on these prices. Securities, derivatives and other investments that are not listed on a stock exchange, but are traded on another regulated market that operates regularly and is recognised and open to the public, are valued at the latest available price on this market.

b) Securities and other investments that are neither listed on a stock exchange nor traded on a regulated market are valued at the last available market price. If no such price is available, the Management Company will value the securities according to other criteria, to be determined by the Board of Directors. The Management Company will base its calculation on the probable selling price, the level of which will be estimated with due care and to the best of the Management Company's knowledge.

c) Money market instruments that are not listed on an exchange, but are traded on another regulated market that operates regularly and is recognised and open to the public, may be valued as follows: The valuation price of such investments, based on the net acquisition price, shall be progressively adjusted to the redemption price while keeping the resulting investment return constant. If there are significant changes in the market conditions, the valuation principles for the individual investments will be adjusted in line with the new market returns.

d) Liquid funds and fiduciary and fixed-term deposits will be valued at their nominal value plus accrued interest.

e) For each sub-fund, the securities that are denominated in a currency other than that of the sub-fund are converted into the sub-fund currency at the relevant mean exchange rate. Futures contracts concluded for the purpose of hedging currency risks are taken into consideration in the conversion.

f) Units in UCITS or other UCIs shall be valued at their last published net asset value. If no net asset value is available, only buying and selling prices, the units of such UCITS and other UCIs may be valued at the mean value of these buying and selling prices. Should no current prices be available, the Management Company will make a valuation according to other criteria, to be determined by the Board of Directors. The Management Company will base its calculation on the probable selling price, the level of which will be estimated with due care and to the best of the Management Company's knowledge.

g) Derivatives which are traded neither on a stock exchange nor on another regulated market will be valued at a market value (fair value) which is appropriate given a careful assessment which takes into account all of the relevant circumstances.

In order to protect existing unitholders, the Board of Directors may decide to have the net asset value of a sub-fund calculated in accordance with the swinging single pricing method described below.

If, on a given bank business day, the total subscriptions or redemptions for all unit classes of a sub-fund result in a net inflow or outflow of assets that exceeds a specified threshold (represented as a percentage of the net asset value), the net

asset value of the sub-fund in question is increased or decreased accordingly (partial swinging single pricing, hereinafter "PSSP"). In such cases, the same net asset value shall apply for all unitholders subscribing or redeeming units on this valuation date.

The maximum adjustment amounts to 2% of the net asset value of the sub-fund concerned. This takes account of both the estimated transaction costs and the tax charges that may be incurred by the sub-fund concerned, as well as the estimated bid-ask spread of the assets in which the sub-fund invests. Such an adjustment will lead to an increase in the net asset value if the net movements result in an increase in the number of units in the relevant sub-fund. It will lead to a reduction in the net asset value if the net movements result in a decline in the number of units.

The Pricing Committee is responsible for determining the swing factor and the threshold, and decides on behalf of the Management Company.

The level of the swing factor is based on the historical incidental expenses arising for the purchase and sale of investments in the case of subscriptions and redemptions (bid-ask spreads, standard brokerage fees, commissions, taxes, etc.).

The threshold is determined on the basis of the historical capital flows for the sub-fund concerned. The threshold also ensures that the net asset value is not swung in the case of a large proportion of the capital flows where no purchases or sales by the portfolio manager are necessary. In some circumstances, the threshold may also be set at zero for a particular period at the discretion of the Pricing Committee.

Where a sub-fund was established less than a year earlier, the swing factor and the threshold are determined depending on the characteristics of this sub-fund. The historical capital flows simulated in this way enable a representative value to be determined for the respective sub-fund.

In extraordinary situations such as unusually high market fluctuations or restricted market liquidity, the net asset value of the relevant sub-fund may be increased or reduced based on the day's average value for incidental expenses for the purchase and sale of investments, or on values derived from the day's market observations. This may lead to the cited maximum adjustment being temporarily exceeded in the best interests of unitholders. Unitholders will

be informed by the Management Company in the usual manner of any such measures.

The Board of Directors has decided to use the PSSP method to calculate the net asset value of all sub-funds.

The Board of Directors may decide to suspend the PSSP method without prior notice for individual or all sub-funds for a day on which a contribution in kind is made.

If, as a result of exceptional circumstances, the aforementioned valuation criteria cannot be applied or appear to be unsuitable, the Management Company is entitled to temporarily use other appropriate valuation criteria.

In exceptional circumstances, additional valuations may be made on one and the same day and will apply to issues and redemptions on that day.

In the event of a large volume of redemption orders, the Management Company may value the units of the sub-fund in question on the basis of the sales prices received in the requisite securities sales transactions.

### 3.3 Sale of units

The issue price must be paid within three bank business days after receipt of the subscription order. In the case of the sub-fund Swisscanto (LU) Equity Fund Systematic Responsible Japan, the issue price must be paid within four bank business days after receipt of the subscription order.

However, the Management Company may extend this period to a maximum of five bank business days if the three-day period or four-day period proves too short. Issue prices are rounded down to the nearest currency unit.

The following are charged on the issue of units:

- an agency fee which goes to the intermediary. The maximum agency fee payable for each sub-fund or unit class is set out in the table in section 1.2 "Structure of the Fund".
- for conversions from one sub-fund to another within the same umbrella fund, the intermediary may charge a maximum of 50% of the permitted issuing agency fee, up to the countervalue of the units submitted for conversion; where unit classes of the same sub-fund are converted, no agency fee is charged.
- any taxes and duties charged in connection with the issue.

The Management Company may, at its discretion, accept contributions in kind for full or partial subscriptions. In such cases, the contribution in kind must comply with the investment policy and restrictions of the sub-fund. In addition, such investments will be audited by an auditor assigned by the Management Company; the audit will be available for inspection. Costs incurred in connection with contributions in kind will be borne by the relevant investor. To calculate the number of units to which an investor is entitled on the basis of his subscription in kind, sub-funds for which the PSSP approach is used may use the valuated net asset value per unit for a valuation date instead of the modified net asset value per unit.

The corresponding number of units will be transferred to investors immediately after payment of the purchase price. The Board of Directors is authorised to accept subscriptions for specific sums of money and, on this basis, consent to the issue of fractions of units of up to four decimal places. In such cases, the Management Company has the power to authorise one of the sales or paying agents to confirm the subscription of units to the unitholders in writing.

Only registered units shall be issued. They are not issued as physical certificates; they exist purely as book entries.

Physical bearer units which were not deposited by 18 February 2016 under the Act of 28 July 2014 on the mandatory immobilisation of bearer shares and units for the purpose of amending the Act of 10 August 1915 on commercial companies have been cancelled and the amounts corresponding to the value of these units deposited with the "Caisse de Consignation" until the holder demands their payment.

Subscribers should note that they must present proof of identity to the agent receiving their subscription, unless they are known personally to the agent. This ruling is intended to help combat the laundering of money originating from criminal activities, in particular the drugs trade.

### 3.4 Redemption of units

In principle, the Management Company will redeem units of the Fund at any time on a bank business day at the redemption price, against surrender of the corresponding unit certificates. Since care must be taken that there are sufficient liquid assets in the Fund, payments on Fund units will usually be made within five bank business days after calculation of the redemption price, unless transfer of the redemption amount to the country in which the redemption has been applied for proves to be impossible owing to

statutory provisions, such as foreign exchange and payment restrictions, or as a result of other circumstances beyond the control of the Depositary.

The units are redeemed in the currency of the sub-fund. No charge is made for redemption. Any taxes due on the redemption will be deducted from the redemption price. Redemption prices are rounded down to the nearest currency unit.

In the event of a large volume of redemption orders, the Depositary and the Management Company may decide to postpone the execution of redemption orders until the necessary assets of the Fund have been sold, without undue delay. Priority must subsequently be given to these deferred redemption orders.

The unit in question expires upon payment of the redemption price.

### 3.5 Conversion of units

Unitholders in each sub-fund are entitled to convert some or all of their units into units of another sub-fund offered for subscription, or to convert units of one class into another class within the same sub-fund. Such conversions may be undertaken on any day on which the net asset value of the sub-fund is calculated. The subscription requirements for a particular unit class must also be fulfilled in the case of the conversion of units from one class to another. One condition is a corresponding conversion application to the Management Company for at least 10 units of a sub-fund or unit class, in addition to the surrender of the unit certificates, if these have been issued. Units are converted on the basis of the net assets of the sub-fund in question, as calculated on the next valuation day. The intermediary may charge commission on conversions of up to half the rate on issue, up to the countervalue of the units submitted for conversion. Where unit classes of the same sub-fund are converted, no agency fee is charged.

The Management Company will use the following formula to determine the number of units into which a unitholder may convert his/her existing units:

$$A = \left( \frac{B \times C}{D} \right) \times E$$

A = Number of units to be issued in the new sub-fund or the new unit class

B = Number of units in the original sub-fund or the original unit class



- C = Redemption price per unit of the original sub-fund or the original unit class
- D = Net asset value per unit of the new sub-fund
- E = Exchange rate between the currencies of the two sub-funds or two unit classes on the date of conversion

Should the calculation of the number of new units in the new sub-fund result in fractions of units, the figure is rounded down to the nearest whole number, unless the Board of Directors has approved the issue of fractions of units. The investor will receive payment for the fractions at the redemption price.

The Management Company will provide the unitholder with the details of the conversion.

### 3.6 Suspension of net asset value calculation and the issue, conversion and redemption of units

The Management Company is entitled to temporarily suspend the calculation of the net asset value, as well as the issue, conversion and redemption of units for one or more sub-funds in the following cases:

- a) If stock exchanges or markets that serve as the basis for the valuation of a substantial proportion of a sub-fund's assets, or foreign exchange markets for the currency in which the net asset value or a significant proportion of a sub-fund's assets are denominated are closed (apart from the usual public holidays), or if business is suspended or restricted on such markets, or if they are temporarily exposed to major fluctuations;
- b) If relevant disposals of a sub-fund's assets are not possible owing to political, economic, military or other emergencies which are beyond the control of the Management Company, or if such action would be detrimental to the interests of the unitholders.
- c) In the event of disruptions in the communications network, or if the net asset value of a sub-fund cannot be calculated with sufficient accuracy.
- d) If restrictions on foreign exchange transactions or other asset transfers make sub-fund transactions impossible, or if the purchase and sale of Fund assets cannot be effected at normal exchange rates.
- e) If special circumstances concerning the careful, proper management of the Fund or sub-fund(s) in question

make such suspension necessary and it is in the interests of the unitholders.

## 4 Appropriation of net income and capital gains

### 4.1 Distribution units

Under Article 12 of the Management Regulations, the Management Company will decide, after closing the annual accounts, whether and to what extent distributions are to be made on distribution units. Where distribution units are concerned, the Fund intends to distribute the greater part of earnings and to make such distributions within four months after the close of the financial year.

Distributions may be made from income (e.g. dividends or interest income) and/or out of capital (this may include realised and unrealised net changes in the net asset value). Distributions from income and/or capital result in an immediate reduction in the net asset value per unit of the sub-fund.

The Management Company is authorised to approve the distribution of interim dividends and the suspension of distributions.

Payment will be made according to the procedure described under section 3.4 "Redemption of units" .

Claims for distributions and allocations that are not made within five years after their due date will become statute-barred and the assets will revert to the corresponding sub-fund or unit classes.

### 4.2 Accumulation units

No distributions are planned for these unit classes. After the deduction of general costs, net income will be used to increase the net asset value of the units (accumulation).

## 5 Taxes and charges

In the Grand Duchy of Luxembourg, the Fund's assets are subject to a "taxe d'abonnement" of 0.05% of net assets for unit classes offered to private investors and of 0.01% p.a. of net assets for unit classes offered to institutional investors, payable quarterly. The Fund's earnings are not taxed in Luxembourg. No withholding tax is currently levied on distributions by the Fund.

Under current legislation, unitholders do not have to pay income tax, wealth tax or any other tax in Luxembourg,

unless they are or have been resident in Luxembourg or operate a business there to which the units belong.

Depending on the person who holds the units directly or indirectly, both gains and capital gains, whether distributed or accumulated, may be subject in whole or in part to withholding tax (e.g. final withholding tax, Foreign Account Tax Compliance Act).

Potential unitholders should find out about the laws and regulations that apply to the subscription, purchase, ownership and sale of units at their place of residence and, if necessary, seek expert advice.

The unit classes for which the Management Company charges an all-in fee for running the Fund, asset management and distribution of the Fund units are listed in section 1.4.5.

In return, the Management Company will bear all costs regularly incurred in connection with running the Fund, asset management as well as with distribution of the Fund, if compensation is made for such costs, such as:

- costs of managing the Fund;
- fees and costs charged by the Depositary and the paying agents;
- costs of distribution;
- all costs imposed by law or by regulations, in particular the costs of publications of all types (such as price publications and notices to investors), as well as the fees payable to the supervisory authorities;
- printing the management regulations and sales prospectuses, as well as the annual and semi-annual reports;
- fees associated with any listing of the Fund and with its distribution both domestically and abroad;
- administrative costs, especially those for bookkeeping and calculating the net asset value;
- costs of paying out annual income to the investors;
- auditor fees;
- advertising costs.

The all-in fee is made up of two components: the flat management fee (to cover asset management and distribution costs) and the flat administration fee (to cover the costs of running the Fund and administrative costs).

The maximum all-in fee, maximum flat management fee and maximum flat administration fee for each sub-fund and unit class are set out in the table in section 1.4.5.

The sum of the flat management fee and the flat administration fee booked may not exceed the rate of the maximum all-in fee for the sub-fund or unit class in question. The aggregate figure for the all-in fee (or flat management fee and flat administration fee) actually paid out of the Fund to the Management Company is published in the Fund's annual and semi-annual reports.

The all-in fee (or flat management fee and flat administration fee) is charged to the Fund assets on a pro rata basis each time the net asset value is calculated, and is paid out at the end of each month.

The all-in fee does not cover taxes levied on the Fund assets, the usual transaction fees charged on purchases and sales or the costs of extraordinary action taken in the interests of the unitholders.

The all-in fee (or flat management fee and flat administration fee) to be paid to the Management Company shall first come out of investment income, then out of realised gains on securities transactions, and then out of fixed assets.

No all-in fee is charged to the Fund in the case of unit classes N, M and S. Therefore, the Management Company is compensated for the management of the Fund (running the Fund, asset management, distribution and other costs that arise; in particular, fees and costs of the Depositary) not by the all-in fee, but by the remuneration set out in the agreements as laid down in section 1.4.5 above (a written asset management agreement, a written advisory agreement, a written investment agreement or some other written service agreement) between the investor, on the one hand, and the Management Company or another company within the Swisscanto Group or a bank, on the other.

The assets of each individual sub-fund shall be liable for all claims against that sub-fund. These costs shall be charged separately to each sub-fund. Costs borne by the Fund which cannot be allocated to a single sub-fund shall be charged to the individual sub-funds in proportion to their net assets. The assets of one sub-fund shall not be liable for claims against the assets of another sub-fund.

## 6 Information for unitholders

### 6.1 Remuneration policy

The Management Company has produced a remuneration policy in accordance with the applicable legal and

regulatory requirements, particularly the UCI Act and the relevant ESMA guidelines on sound remuneration policies (ESMA/2016/411); this policy applies to all employees, in particular those identified under the UCI Act and including the salaried directors and executives of the Management Company. The remuneration policy has been prepared with the aim of protecting the interests of the investors as well as the interests of the Management Company and the Group on a long-term, sustainable basis. It is also in line with the business strategy, the goals and values of the Management Company and the funds it manages, and comprises measures aimed at avoiding conflicts of interest.

The remuneration policy is designed to promote effective, sound risk management and to prevent excessive risk-taking.

Employee remuneration consists of a fixed and a variable component; these are in due proportion to one another, such that percentage of the fixed component of total remuneration is high enough to facilitate total flexibility in relation to the variable component and also to be able to waive payment of a variable component entirely. The variable component is largely based on the consolidated net income, the performance of the Management Company and the function and performance of the employee.

The performance targets for individual employees are assessed and reviewed annually. The annual assessment provides a basis for setting the level of variable remuneration and any increase in the fixed element. Financial as well as non-financial criteria are taken into account when assessing an employee's individual performance. The variable component may be waived entirely following a failure to meet performance targets or a poor business result.

The version of the remuneration policy currently in force, which includes a precise description of this policy, details of how remuneration is calculated, other compensation and the identity of the persons responsible for awarding the remuneration, is available at [www.swisscanto.com/lu/de/gs/rechtliche-hinweise/verguetungspolitik.html](http://www.swisscanto.com/lu/de/gs/rechtliche-hinweise/verguetungspolitik.html) and in hard copy, free of charge, at the registered office of the Management Company.

## 6.2 Accounting reports

The annual audited accounting reports will be made available to unitholders at no charge no later than four months after the end of the financial year (31 March) at the

registered office of the Management Company and the offices of the sales and paying agents. Unaudited semi-annual reports will be made available in the same way no later than two months after the end of the reporting period (30 September). Separate accounts will be drawn up for the individual sub-funds. The total of the sub-funds – after conversion into the currency of the Fund (EUR) – constitutes the Fund assets.

In the event that liabilities from transactions involving derivative financial instruments and/or loans exist at the end of the financial year, they are to be explicitly stated in the accounting report, i.e. the strike price of current options and any liabilities associated with financial forwards and futures. Total liabilities from currency forwards must be stated for each type of transaction.

## 6.3 Data protection

Investors are advised that for organisational reasons and due to the outsourcing of various tasks, it is possible that personal data and information on the unitholders may be processed in countries which may not be subject to the same data protection standards as in Luxembourg.

## 6.4 Other Information

Other information on the Fund or the Management Company, as well as on the net asset value and the issue and redemption prices of the units is available at the registered office of the Management Company on all bank business days.

The issue and redemption prices i.e. the net asset value of all unit classes, together with the note "excluding commission", as well as any notifications relating to a suspension of net asset value calculations will also be published on every bank business day on the website: [www.swisscanto.com](http://www.swisscanto.com) as well as [www.fundinfo.com](http://www.fundinfo.com).

The Management Company may amend these provisions in whole or in part at any time in the interests of the unitholders and with the consent of the Depositary. Unless otherwise specified, amendments to the Management Regulations shall enter into force upon signature.

Unitholders listed in the register of unitholders will be promptly informed of changes to this Sales Prospectus and the Management Regulations by written notice.

In addition, the following documents are available for inspection at the registered office of the Management Company during normal business hours. Copies are available free of charge from this office:

- Management Regulations
- Articles of Association of the Management Company
- Depositary Agreement between the Management Company and the Depositary.

The latest version of the Sales Prospectus, the Management Regulations, the Key Investor Information Document, the annual and semi-annual reports and notices to investors are available online at [www.swisscanto.com](http://www.swisscanto.com).

Management Company:  
**Swisscanto Asset Management International S.A.**

Depositary:  
**CACEIS Investor Services Bank S.A.**

## Specific provisions governing the sale of units in Germany, Austria and Liechtenstein

### **In the Federal Republic of Germany: Additional information for unitholders in the Federal Republic of Germany**

#### **Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160) are available from:**

RBC Investor Services Bank S.A.  
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: [cswisscanto@rbc.com](mailto:cswisscanto@rbc.com)

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

#### **The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160) are available from [www.eifs.lu/swisscanto](http://www.eifs.lu/swisscanto):**

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

#### **Reference point for Fund's documents**

In addition, the sales prospectus, the key investor information document, the management regulations, the semi-annual reports and the audited annual reports, as well as the issue and redemption prices and any notices for unitholders are published daily at [www.swisscanto.com](http://www.swisscanto.com) and at [www.fundinfo.com](http://www.fundinfo.com).

#### **Particular risks associated with obligations to provide evidence for tax purposes in Germany**

It is the intention of the Management Company to provide details of the tax base for Germany in accordance with the Investment Tax Act (InvStG). The Management Company must provide evidence that this tax base is accurate at the request of the German tax authorities. The principles for calculating this data may be

interpreted in different ways and no assurance can therefore be given that the German tax authorities will acknowledge every material aspect of the calculation method used by the Management Company. Should past mistakes come to light, corrections will not be made with relation to the past but instead taken into account when preparing the data for the current financial year. The correction may be to the advantage or disadvantage of unitholders receiving a distribution or having an accumulation amount credited to them during that financial year.

## **In Austria**

The following information is directed at potential investors in the Republic of Austria. It complements and clarifies the statements made in this sales prospectus with regard to the sale of fund units in Austria.

### **Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from:**

RBC Investor Services Bank S.A.  
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: [cswisscanto@rbc.com](mailto:cswisscanto@rbc.com)

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

### **The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from [www.eifs.lu/swisscanto](http://www.eifs.lu/swisscanto):**

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

### **Publications**

Issue and redemption prices are also published on the website of the daily newspaper "Der Standard" ([www.derstandard.at](http://www.derstandard.at)) and any other announcements at [www.swisscanto.com](http://www.swisscanto.com) and [www.fundinfo.com](http://www.fundinfo.com).

### **In the Principality of Liechtenstein**

The following information is directed at potential investors in the Principality of Liechtenstein. It complements and clarifies the statements made in this sales prospectus with regard to the sale of fund units in Principality of Liechtenstein.

#### **Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from:**

RBC Investor Services Bank S.A.  
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: [cswisscanto@rbc.com](mailto:cswisscanto@rbc.com)

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

#### **The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from [www.eifs.lu/swisscanto](http://www.eifs.lu/swisscanto):**

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

#### **Publications**

The net asset values are published at least twice a month on the website of Swiss Fund Data AG at [www.swissfunddata.ch](http://www.swissfunddata.ch).

#### **Place of performance and jurisdiction**

The place of performance and jurisdiction is Vaduz.

# ANNEX

## SUSTAINABILITY-RELATED DISCLOSURES SPECIFIC TO THE SUB-FUND IN ACCORDANCE WITH REGULATION (EU) 2019/2088



## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible Eurozone**

Legal entity identifier: (LEI-Code):

**549300JHENP6KBF18K96**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in the equity securities of companies whose registered office or primary business activities are in the eurozone. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive

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

contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

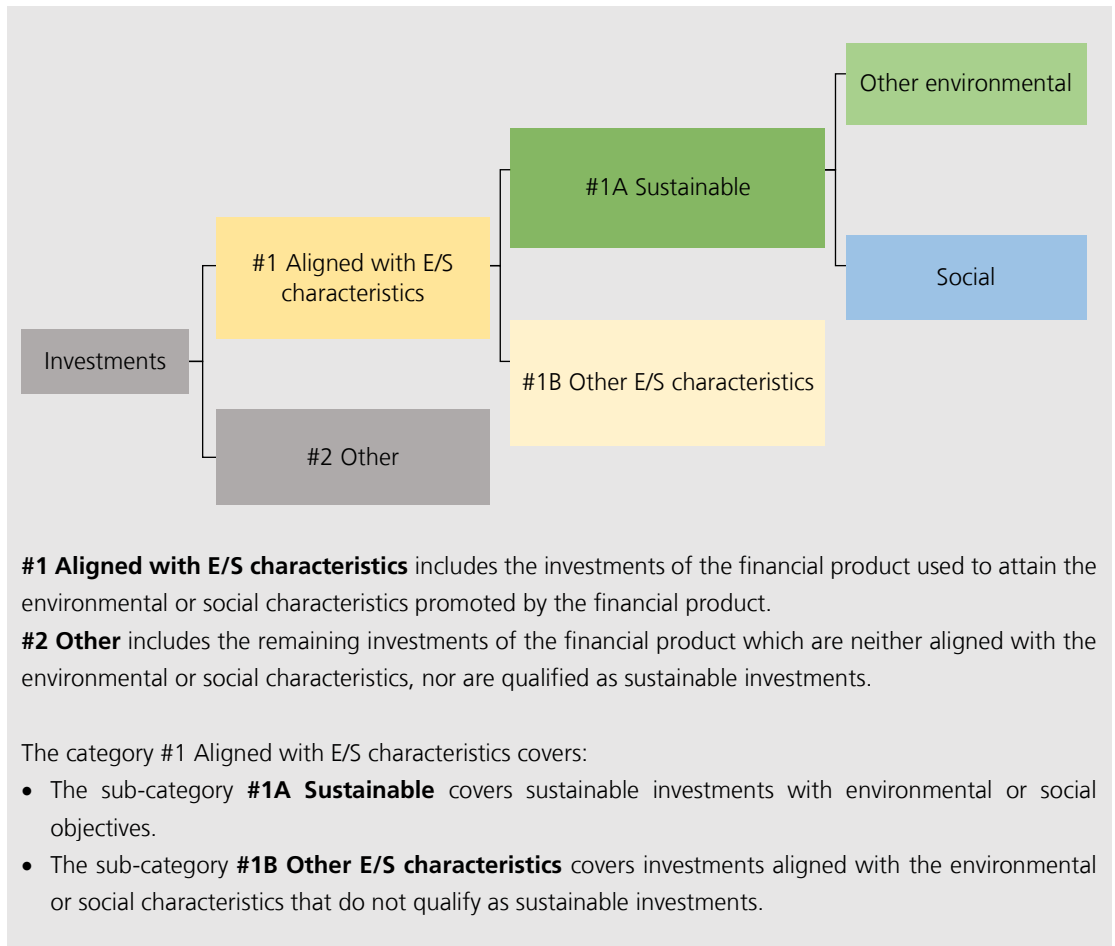
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.





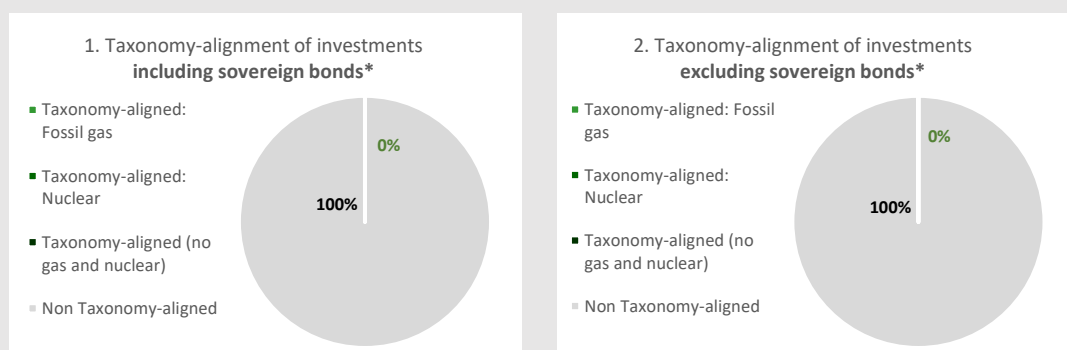
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU1900091734>.

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

## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible Japan**

Legal entity identifier: (LEI-Code):

**549300LD9J42DM6UI310**

Version:

**July 2023**

**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.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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.**

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 lay down 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 sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in the equity securities of companies whose registered office or primary business activities are in Japan. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive

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

contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.



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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

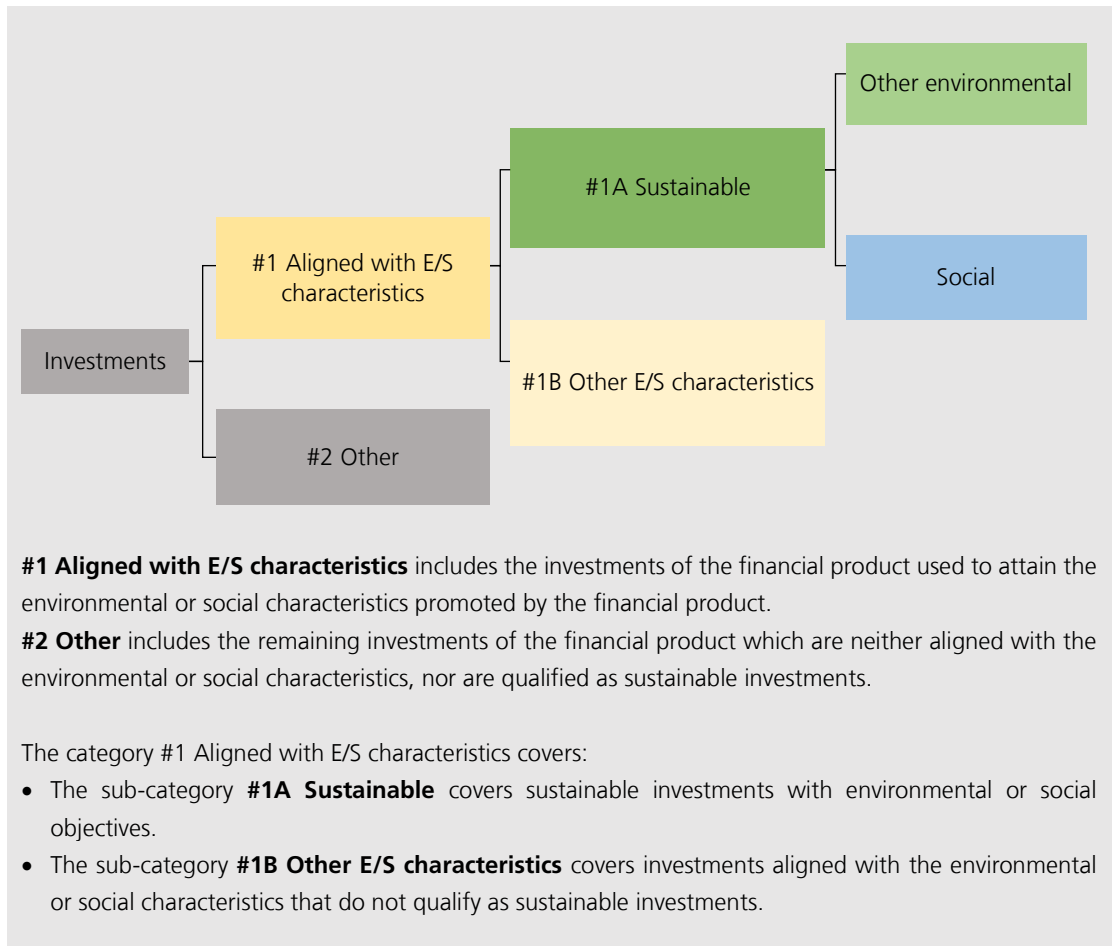
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



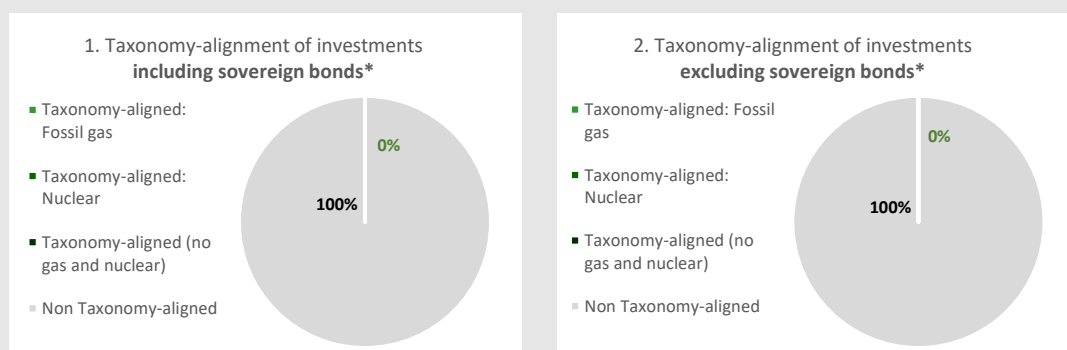
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU1900092112>.

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

## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible Emerging Markets**

Legal entity identifier: (LEI-Code):

**549300D6C2DWKAX5NM62**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in the equity securities of companies whose registered office or primary business activities are in emerging markets countries. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive

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

contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

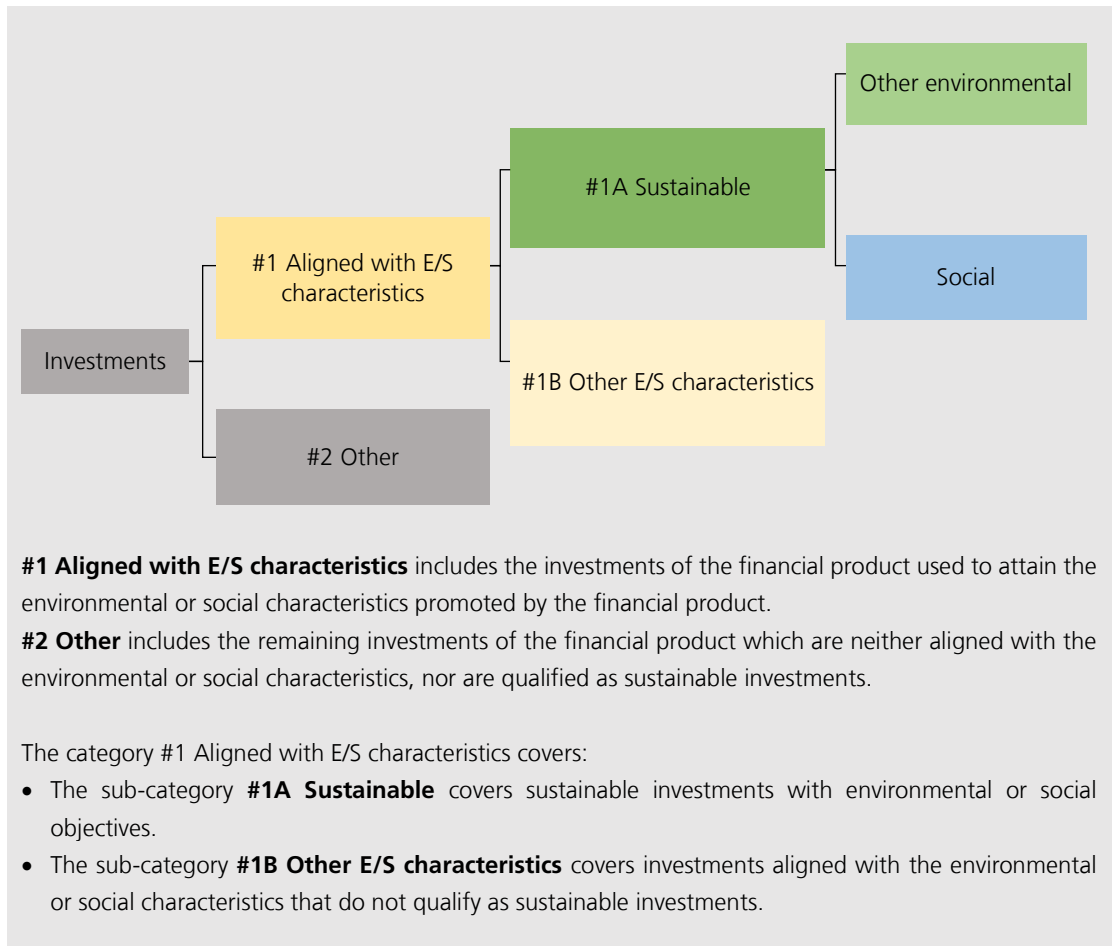
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



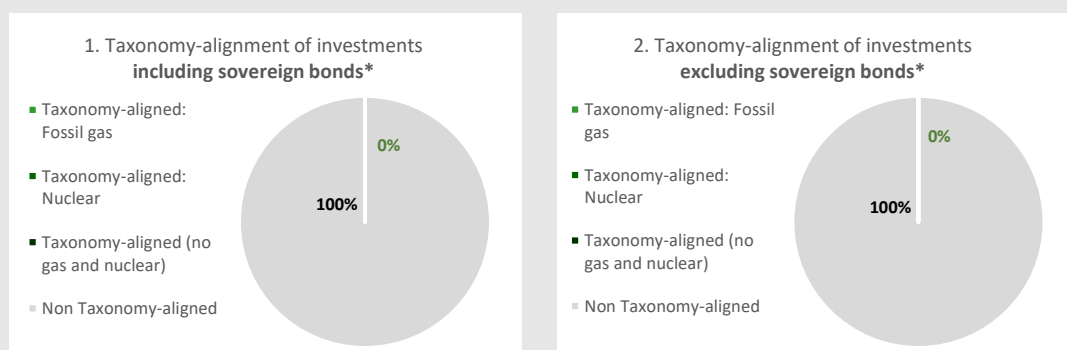
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU1900093359>.

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

## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible Global**

Legal entity identifier: (LEI-Code):

**5493006R3S8PDES2LE27**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of



time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in equity securities of companies. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore

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

limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

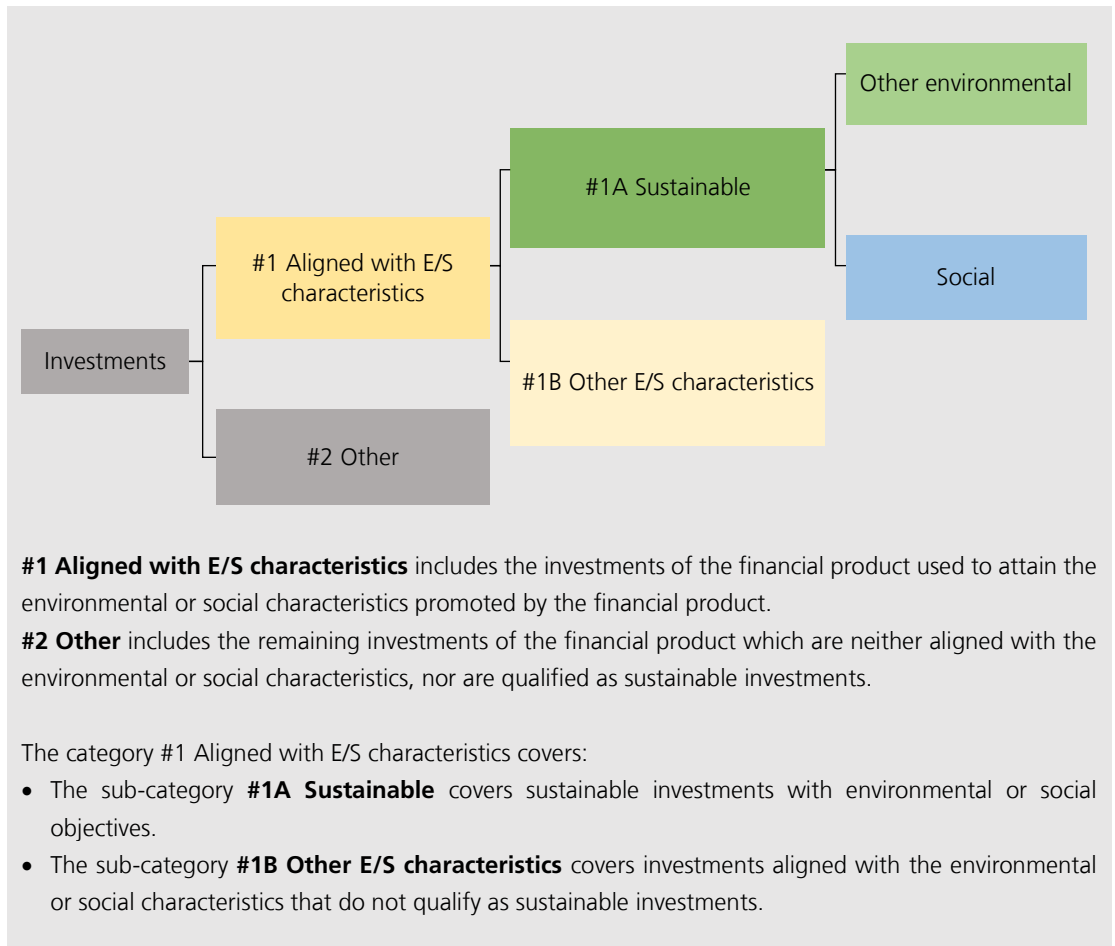
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



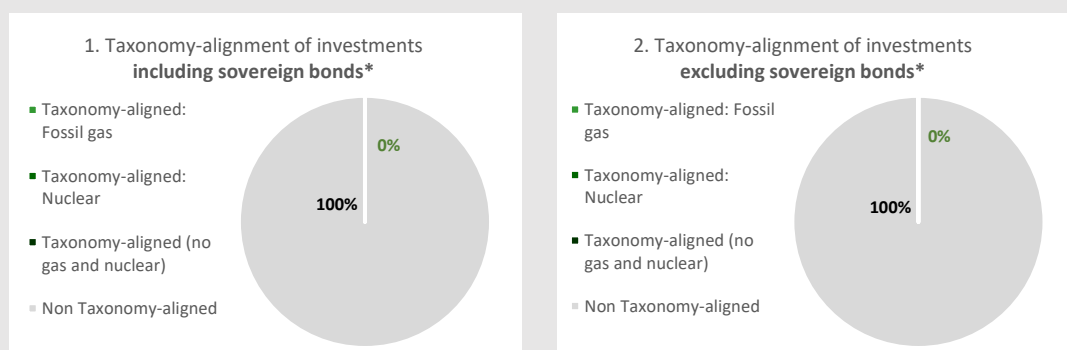
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU1900093193>.

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



## 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:

**Swisscanto (LU) Equity Fund Responsible Europe Top Dividend**

Legal entity identifier: (LEI-Code):

**54930065W8GPK4IGO606**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in the equity securities of companies with high dividend yields that are based or have their main business activity in Europe.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore

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

limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

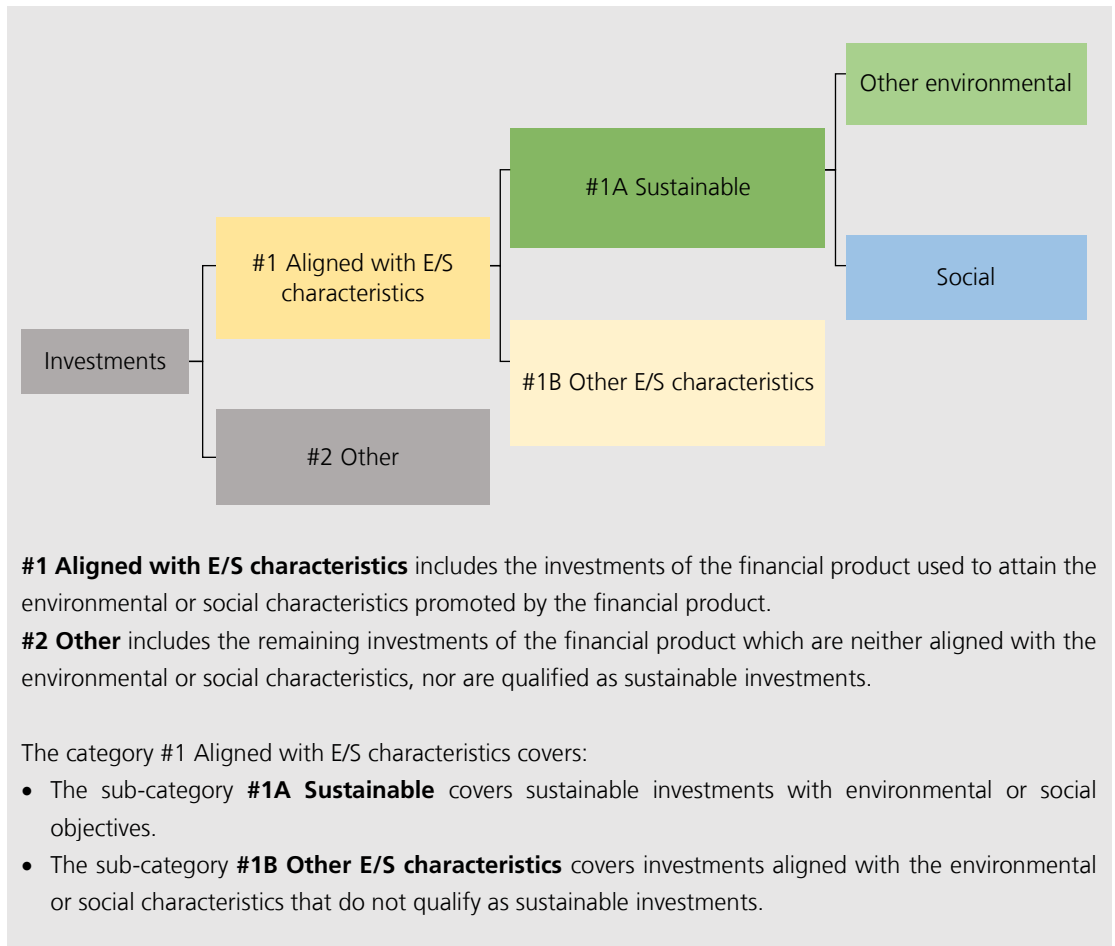
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.





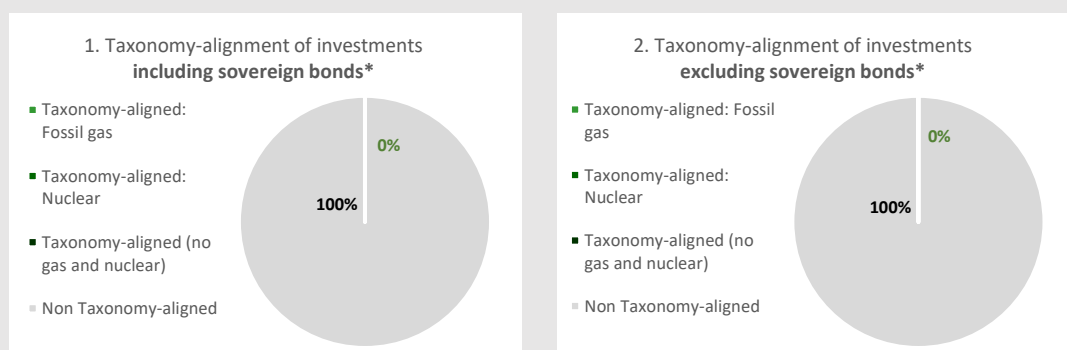
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU0230112392>.

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

## Pre-contractual disclosure

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:

**Swisscanto (LU) Equity Fund Sustainable Global Climate**

Legal entity identifier (LEI-Code):

**549300T84Y203EKMK657**

Version:

**July 2023**

**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**: 80%

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**: \_\_\_\_\_%

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will 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**.



## **What is the sustainable investment objective of this financial product?**

### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses 80% of the net assets of this sub-fund on the securities of companies which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the “SDGs”), particularly those focused on preventing and combating climate change.

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

The Portfolio Manager uses a range of data points to measure the attainment of its sustainable investment objectives. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the sustainable investment objectives:

#### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses on the securities of companies which, based on its assessment, make a contribution to sustainable objectives relating, in particular, to one or more climate-related SDGs. The products and services of companies (hereinafter “sustainable solutions”) are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to determine the proportion of the business that has a positive or negative impact on one or more of these objectives. The main focus is on companies that make a contribution to mitigating climate change and its consequences, and offering products and services in the following areas: energy efficiency, renewable energies, resource efficiency, private transport, and public transport and logistics.

#### **2. Exclusion criteria**

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social values, or business activities that are considered high risk. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in exclusion:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
  - Manufacture of war technology
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)

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

- Breaches of the UN Global Compact.
- Child labour
- Production of pornography
- Coal mining
- Operation of nuclear plants
- Uranium extraction
- Production of nuclear reactors
- Genetic engineering: human medicine
- Production of tobacco products and cigarettes
- Alcohol production (> 5% turnover)
- Gambling (> 5% of turnover)
- Factory farming
- Coal reserves
- Operation of fossil fuel power plants
- Natural gas extraction
- Oil extraction
- Conventional car manufacturers that do not have a comprehensive strategy for the transition to the use of alternative more environmentally friendly motors
- Aircraft production
- Airlines
- Cruise ship operators
- Genetic engineering (release of GMOs)
- Unsustainable fishing and fish farming
- Unsustainable forestry management

Investments that no longer comply with the characteristics described in points 1–2 are removed from the portfolio by an appropriate deadline.

The sub-fund does not use a reference benchmark to meet the described sustainable investment objectives.

**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?**

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

Issuers with a negative net contribution to the SDGs are removed from the investment universe of the financial product. The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts, hereinafter "PAIs"). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs do not qualify as 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?

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.



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

Yes,

The sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of a PAI rating are excluded from the investment universe.

The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.

The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

No



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

The fund invests at least 80% of its assets in equity securities of companies that contribute to reducing climate change or its consequences.

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

### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager invests in securities which, in its opinion, make a contribution to one or more climate-related sustainable objectives. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. The main focus is on mitigating and combating climate change and companies offering products and services in the following areas: energy efficiency, renewable energies, resource efficiency, private transport, and public transport and logistics. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

### **2. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager considers to be high-risk, including, for example, the securities of companies manufacturing weapons or with coal reserves, etc. The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth.

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

The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

#### **4. Investments in SDG leaders**

When constructing the investment universe, the Portfolio Manager considers the securities of issuers whose products and services make a significant contribution to the relevant SDGs, particularly those relating to climate change (“SDG leaders”). A significant contribution means at least 66.67% of turnover from a sustainable solution with a strongly positive contribution, or 33.33% of turnover from a sustainable solution with a positive contribution. In exceptional cases, an issuer may qualify as an SDG leader if it produces a key component of a sustainable solution, even if the 66.67% or 33.33% threshold is not met. As a result of the turnover requirements for inclusion in the investment universe, SDG leaders generally account for a high proportion of sustainable investments.

#### **5. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers based on proprietary ESG scores.

The weighting of all positions in ESG laggards in the sub-fund is the same or lower than the weighting of all positions in ESG laggards in the sub-fund’s benchmark.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Any breach of these standards results in the exclusion of the issuer from the financial product’s universe of investee companies.

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

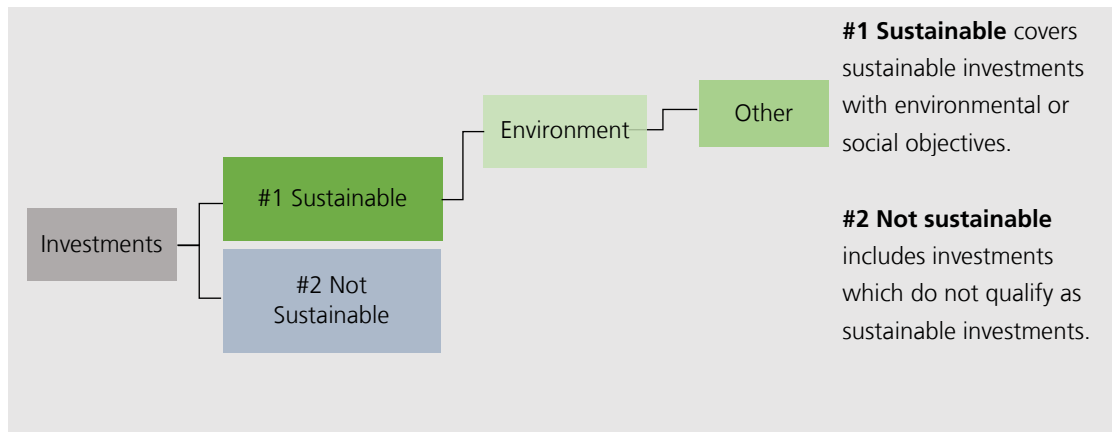




## What is the asset allocation and the minimum share of sustainable investments?

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

The Portfolio Manager invests at least 80% of the net assets of the sub-fund in sustainable investments in accordance with Article 9(2) SFDR, which contribute to the mitigation of climate change and its consequences.



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

Derivatives are not used to achieve the sustainable investment objective.



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

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### ● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy<sup>1</sup>?

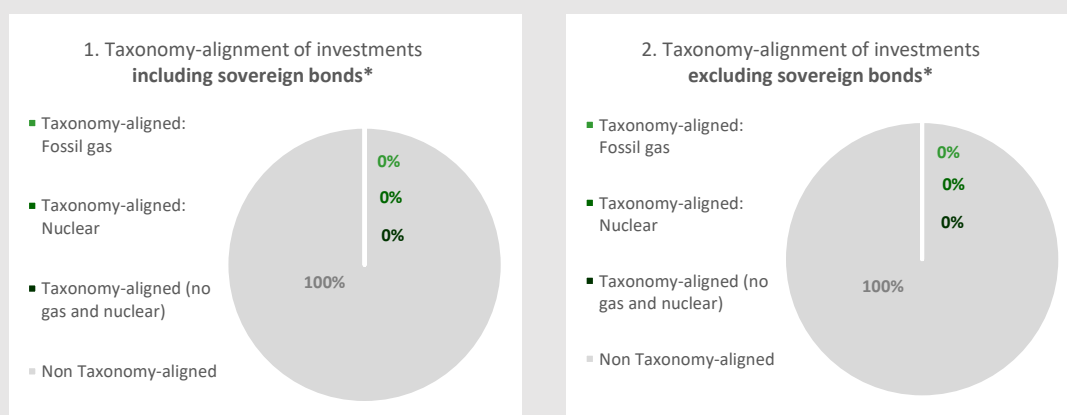
- Yes  
 In fossil gas       In nuclear energy
- No

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 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?

0% of the portfolio.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



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

The minimum share of sustainable investments with an environmental objective is 80% of the portfolio.



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

The minimum share of sustainable investments with a social objective is 0% of the portfolio.



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

Investments classified as “not sustainable” are all investments included in net assets after the deduction of sustainable investments. No investments other than sustainable investments are made. Derivatives and cash are excluded.



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

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

An index is not used as a reference benchmark to meet the sustainable investment objectives.



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

Further information on the product-related sustainability policy of the sub-fund can be found on the following website:

<https://products.swisscanto.com/products/product/LU2417103780>.

## Pre-contractual disclosure

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:

**Swisscanto (LU) Equity Fund Sustainable Global Water**

Legal entity identifier (LEI-Code):

**549300CS480K13QXNY80**

Version:

**July 2023**

**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**: 75%

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**: 5%

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will 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**.



## ***What is the sustainable investment objective of this financial product?***

### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses 80% of the net assets of this sub-fund on the securities of companies which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the water-related United Nations Sustainable Development Goals (hereinafter the “SDGs”).

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

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

The Portfolio Manager uses a range of data points to measure the attainment of its sustainable investment objectives. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the sustainable investment objectives:

#### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses on the securities of companies which, based on its assessment make a contribution to sustainable objectives relating, in particular, to one or more of the SDGs focused on water. The products and services of companies (hereinafter “sustainable solutions”) are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to determine the proportion of the business that has a positive or negative impact on one or more of these objectives. The main focus is on companies offering technologies, products or services related to the water supply chain. In particular, companies in the water supply, water technology, water treatment, water services, water purification and water recycling segments will be targeted.

#### **2. Exclusion criteria**

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social values, or business activities that are considered high risk. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in exclusion:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
  - Manufacture of war technology
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact.
- Child labour
- Production of pornography
- Coal mining
- Operation of nuclear plants
- Uranium extraction
- Production of nuclear reactors
- Genetic engineering: human medicine
- Production of tobacco products and cigarettes
- Alcohol production (> 5% turnover)
- Gambling (> 5% of turnover)
- Factory farming
- Coal reserves
- Operation of fossil fuel power plants
- Natural gas extraction
- Oil extraction
- Conventional car manufacturers that do not have a comprehensive strategy for the transition to the use of alternative more environmentally friendly motors
- Aircraft production
- Airlines
- Cruise ship operators
- Genetic engineering (release of GMOs)
- Unsustainable fishing and fish farming
- Unsustainable forestry management

Investments that no longer comply with the characteristics described in points 1–2 are removed from the portfolio by an appropriate deadline.

The sub-fund does not use a reference benchmark to meet the described sustainable investment objectives.

**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?**

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

Issuers with a negative net contribution to the SDGs are removed from the investment universe of the financial product. The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts, hereinafter "PAIs"). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs do not qualify as 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?

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.



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

- Yes,  
The sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of a PAI rating are excluded from the investment universe.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in equity securities of companies that provide technologies, products or services related to the water value chain. In particular, companies in the sectors of water supply, water technologies, water treatment, water services, water purification and water recycling are targeted.

**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?***

#### **1. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager invests in securities which, in its opinion, make a contribution to one or more water-related sustainable objectives. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. The main focus is on companies offering technologies, products or services related to the water supply chain. In particular, companies in the water supply, water technology, water treatment, water services, water purification and water recycling segments will be targeted. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

#### **2. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated



by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

#### 4. Investments in SDG leaders

When constructing the investment universe, the Portfolio Manager considers the securities of issuers whose products and services make a significant contribution, particularly to water-related SDGs (“SDG leaders”). A significant contribution means at least 66.67% of turnover from a sustainable solution with a strongly positive contribution, or 33.33% of turnover from a sustainable solution with a positive contribution. In exceptional cases, an issuer may qualify as an SDG leader if it produces a key component of a sustainable solution, even if the 66.67% or 33.33% threshold is not met. As a result of the turnover requirements for inclusion in the investment universe, SDG leaders generally account for a high proportion of sustainable investments.

#### 5. ESG integration

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weighting of all positions in ESG laggards in the sub-fund is the same or lower than the weighting of all positions in ESG laggards in the sub-fund’s benchmark.

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

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

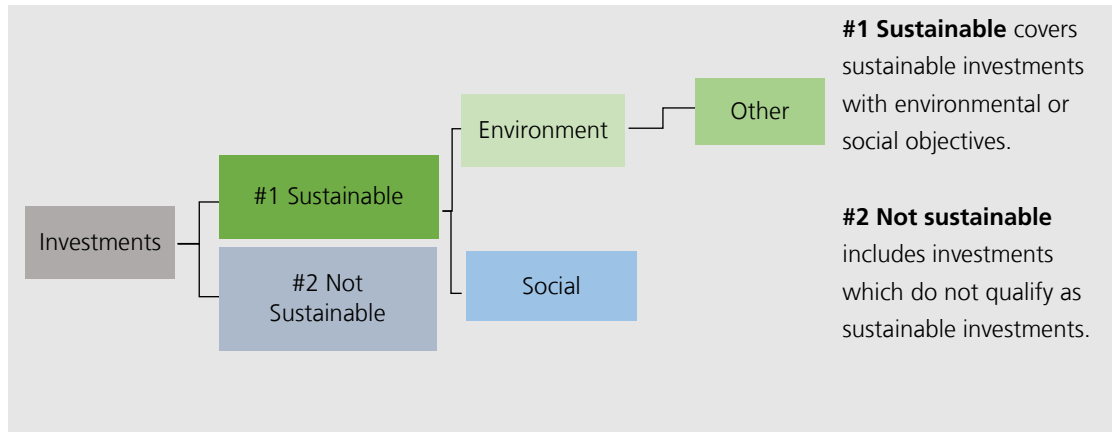
Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Any breach of these standards results in the exclusion of the issuer from the financial product’s universe of investee companies.



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

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

The Portfolio Manager invests at least 80% of the net assets of the sub-fund in sustainable investments in accordance with Article 9(2) SFDR.



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

Derivatives are not used to achieve the sustainable investment objective.



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

0% des Portfolios. Der Fonds verfolgt keine nachhaltigen Investitionen im Einklang mit der EU-Taxonomie.

### ● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy<sup>1</sup>?

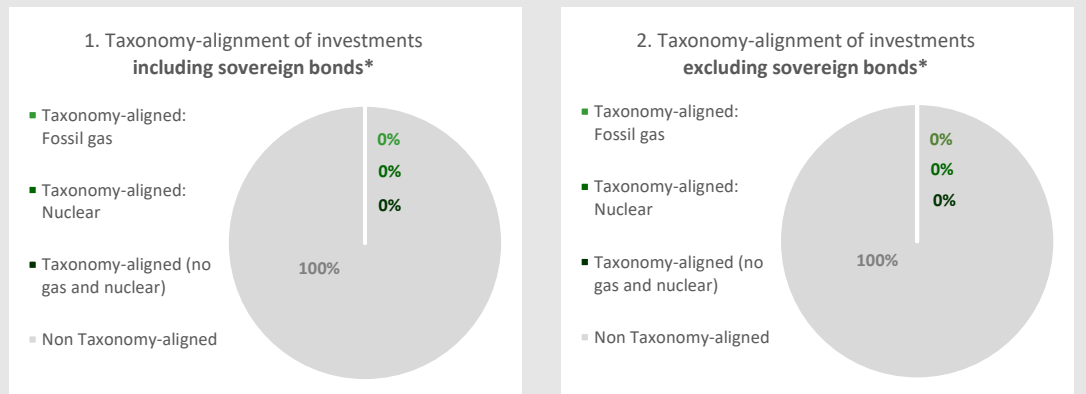
- Yes
  - In fossil gas
  - In nuclear energy
- No

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 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?

0% of the portfolio.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



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

The minimum share of sustainable investments with an environmental objective is 75% of the portfolio.



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

The minimum share of sustainable investments with a social objective is 5% of the portfolio.



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

Investments classified as “not sustainable” are all investments included in net assets after the deduction of sustainable investments. No investments other than sustainable investments are made. Derivatives and cash are excluded.



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

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

An index is not used as a reference benchmark to meet the sustainable investment objectives.



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

Further information on the product-related sustainability policy of the sub-fund can be found on the following website:

<https://products.swisscanto.com/products/product/LU1663824750>.

## 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:

**Swisscanto (LU) Equity Fund Responsible Global Innovation Leaders**

Legal entity identifier: (LEI-Code):

**549300Q23LCKN1X6WK78**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in the equity securities of companies from a wide variety of sectors. The fund focuses on companies with intensive research and development activities that consequently create potential for future product innovations and company growth.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to

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

traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

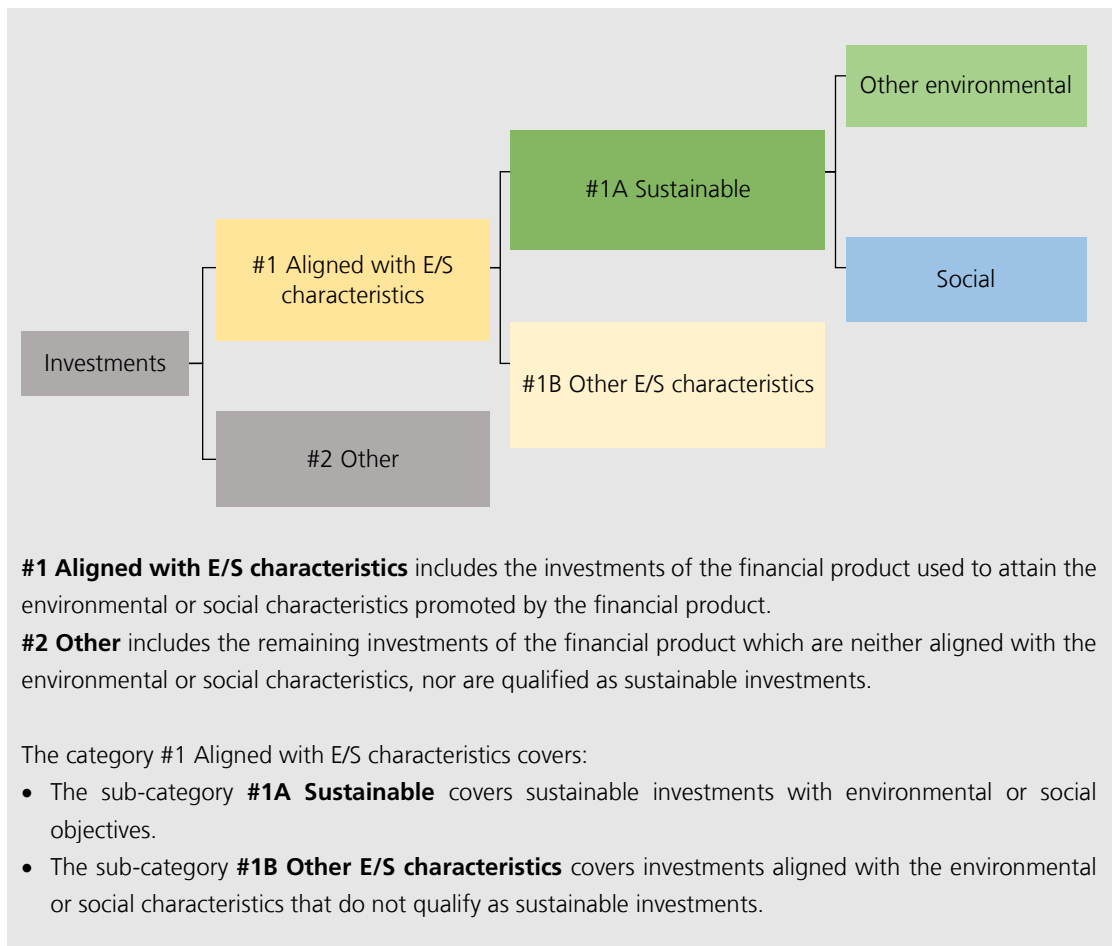
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



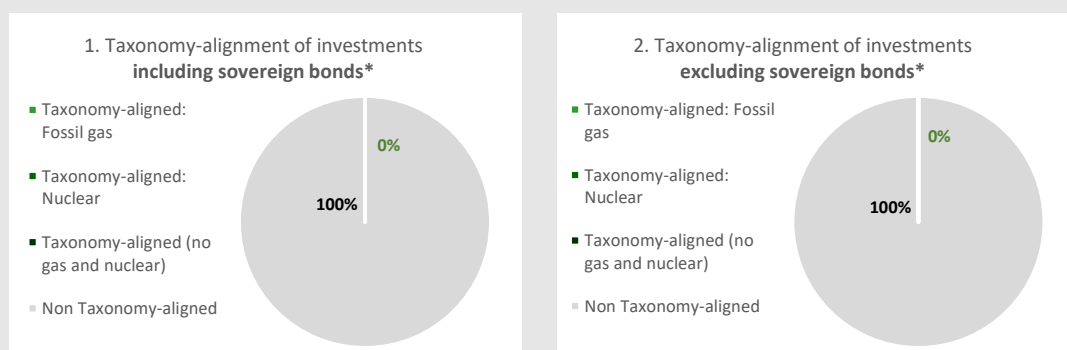
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU0102842878>.

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

## Pre-contractual disclosure

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:

**Swisscanto (LU) Equity Fund Sustainable**

Legal entity identifier (LEI-Code):

**549300DDX1YJO3FS0063**

Version:

**July 2023**

**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**: 20%

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**: 30%

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will 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**.



## ***What is the sustainable investment objective of this financial product?***

The primary sustainable investment objective of this financial product is the reduction of CO<sub>2</sub> emissions (quota of 80%) within the meaning of Article 9(3) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

### **1. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity for the portfolio is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement. The Portfolio Manager does not rely on an external reference benchmark aligned with the targets of the Paris Climate Agreement to achieve this objective. Instead, the Portfolio Manager ensures, as part of the direct investment process, that the methodology requirements for EU Paris-aligned benchmarks under Delegated Regulation (EU) 2020/1818 are met, rather than the Paris climate target of 1.5 degrees, whereby: (i) greenhouse gas (GHG) emissions are reduced by at least 7.5% plus economic growth per annum; (ii) the weighting of green versus brown investments is at least four times that of the benchmark; and (iii) the exclusions of Delegated Regulation 2020/1818 are complied with.

In accordance with the active investment strategy without use of an external reference benchmark, the requirements of Delegated Regulation 2020/1818 in relation to exposure to climate-critical sectors and GHG intensity are not implemented in relative terms versus a benchmark, but by means of absolute objectives to reduce the CO<sub>2</sub>e intensity of investments (pursuit of a decarbonisation trajectory).

In calculating the decarbonisation trajectory, we do not use Scope 3 GHG emissions due to insufficient data quality and incomplete data coverage, whilst awaiting better data coverage.

### **2. Sustainable investments in accordance with Article 9(2) SFDR**

In addition to the reduction of CO<sub>2</sub>e intensity, the Portfolio Manager focuses on the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs").



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

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

The Portfolio Manager uses a range of data points to measure the attainment of its sustainable investment objectives. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the sustainable investment objectives:

**1. Reduction of CO<sub>2</sub>e intensity**

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

**2. Exclusion criteria**

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social values, or business activities that are considered high risk. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following activities correspond to the exclusions described in Delegated Regulation 2020/1818. The Portfolio Manager has also determined other additional activities which result in the exclusion of companies from the investment universe:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
  - Manufacture of war technology
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact.
- Child labour
- Production of pornography
- Coal mining
- Operation of nuclear plants
- Uranium extraction
- Production of nuclear reactors
- Genetic engineering: human medicine
- Production of tobacco products and cigarettes
- Alcohol production (> 5% turnover)
- Gambling (> 5% of turnover)
- Factory farming
- Coal reserves
- Operation of fossil fuel power plants
- Natural gas extraction
- Oil extraction
- Conventional car manufacturers that do not have a comprehensive strategy for the transition to the use of alternative more environmentally friendly motors
- Aircraft production
- Airlines
- Cruise ship operators
- Genetic engineering (release of GMOs)
- Unsustainable fishing and fish farming
- Unsustainable forestry management

### **3. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses on the securities of companies, which, based on its assessment, make a contribution to sustainable objectives relating to one or more of the SDGs. The products and services of companies (hereinafter “sustainable solutions”). The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

If a sub-fund no longer complies with the characteristics described in point 1, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2e</sub> intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

Investments that no longer comply with the characteristics described in points 2 – 3 are removed from the portfolio by an appropriate deadline.

The sub-fund does not use a reference benchmark to meet the described sustainable investment objectives.

**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?**

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

Issuers with a negative net contribution to the SDGs are removed from the investment universe of the financial product. The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts, hereinafter "PAIs"). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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?*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.



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

- Yes,  
The sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of a PAI rating are excluded from the investment universe.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- 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 fund invests at least 85% of its assets in equity securities and value rights of companies. A maximum of 15% of the net assets can be invested in variable and fixed income securities and money market instruments as well as liquidity.

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

#### **1. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

#### **2. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). These include the exclusions described in Delegated Regulation 2020/1818. The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **3. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager invests in securities which, in its opinion, make a contribution to one or more sustainable objectives. The sustainable solutions of companies are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs.

For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm

to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

#### **4. Investments in SDG leaders**

When constructing the investment universe, the Portfolio Manager considers the securities of issuers whose products and services make a significant contribution to the SDGs (“SDG leaders”). A significant contribution means at least 66.67% of turnover from a sustainable solution with a strongly positive contribution, or 33.33% of turnover from a sustainable solution with a positive contribution. In exceptional cases, an issuer may qualify as an SDG leader if it produces a key component of a sustainable solution, even if the 66.67% or 33.33% threshold is not met. As a result of the turnover requirements for inclusion in the investment universe, SDG leaders generally account for a high proportion of sustainable investments in accordance with Article 9(2).

#### **5. Investments in ESG leaders**

For the purposes of diversification, the Portfolio Manager also includes securities in the investment universe that are assessed as above-average on a best-in-class basis relating to a sustainable economic approach using environmental, social and governance (ESG) criteria. These securities are referred to as ESG leaders. Proprietary ESG scores calculated by the Portfolio Manager for companies are used as the basis for identifying ESG leaders. These are based on the data of independent third-party providers and calculated using proprietary criteria, algorithms and weightings. The Portfolio Manager considers the relevance of ESG criteria with regards to sustainability risks and opportunities. The ESG scores calculated cover a scale of 0 to 100, whereby 0 is the lowest value, 50 the average, and 100 the best.

ESG leaders are companies with an ESG score  $\geq 50$ . In exceptional cases, ESG leaders may be defined on the basis of fundamental research even if their ESG score is under 50.

If an ESG leader generates turnover that qualifies as sustainable investment in accordance with Article 9(2) SFDR, this is also included in sustainable investments in accordance with Article 9(2) SFDR. However, as there is no minimum turnover requirement for ESG leaders, this typically represents a significantly lower proportion than for SDG leaders.

#### **6. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution (opportunities) to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers based on proprietary ESG scores.

The weighting of all positions in ESG laggards in the sub-fund is the same or lower than the weighting of all positions in ESG laggards in the sub-fund’s benchmark.

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

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

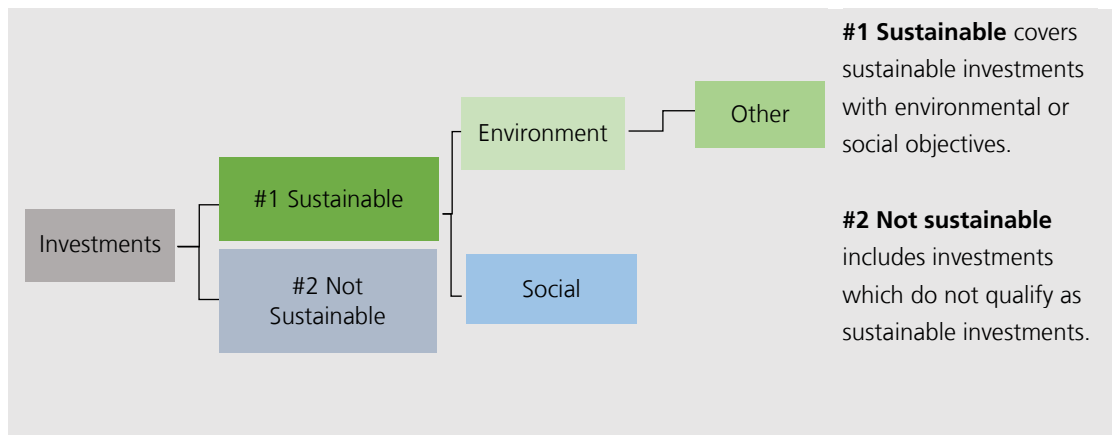
Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Any breach of these standards results in the exclusion of the issuer from the financial product's universe of investee companies.



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

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

The Portfolio Manager pursues the aforementioned sustainable investment objectives: (i) reduction of CO<sub>2</sub>e intensity in accordance with Article 9(3) SFDR; and (ii) sustainable investment in accordance with Article 9(2) SFDR. The reduction of CO<sub>2</sub>e intensity aligned with the 1.5-degree target of the Paris Climate Agreement is applied to 80% of the sub-fund's portfolio (excluding cash and derivatives). The Portfolio Manager invests at least 50% of the net assets of the sub-fund in sustainable investments in accordance with Article 9(2) SFDR.



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

Derivatives are not used to achieve the sustainable investment objective.



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

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.

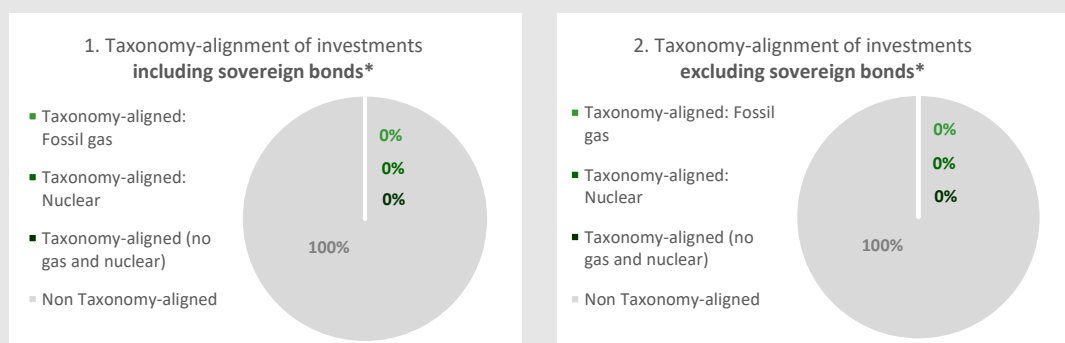
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

0% of the portfolio. The fund does not pursue sustainable investments aligned with the EU taxonomy.

### ● 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

**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?

0% of the portfolio.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



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

The minimum proportion of sustainable investments with an environmental objective is 20% of the portfolio.



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

The minimum proportion of sustainable investments with a social objective is 30% of the portfolio.



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

Investments classified as “not sustainable” are all investments included in net assets after the deduction of sustainable investments. No investments other than sustainable investments are made. Derivatives and cash are excluded.



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

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

An index is not used as a reference benchmark to meet the sustainable investment objectives.



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

Further information on the product-related sustainability policy of the sub-fund can be found on the following website:

<https://products.swisscanto.com/products/product/LU0161535835>.



## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible Selection International**

Legal entity identifier: (LEI-Code):

**5493000P2B9KQ86KT462**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs"). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in equity securities of companies. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore

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

limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

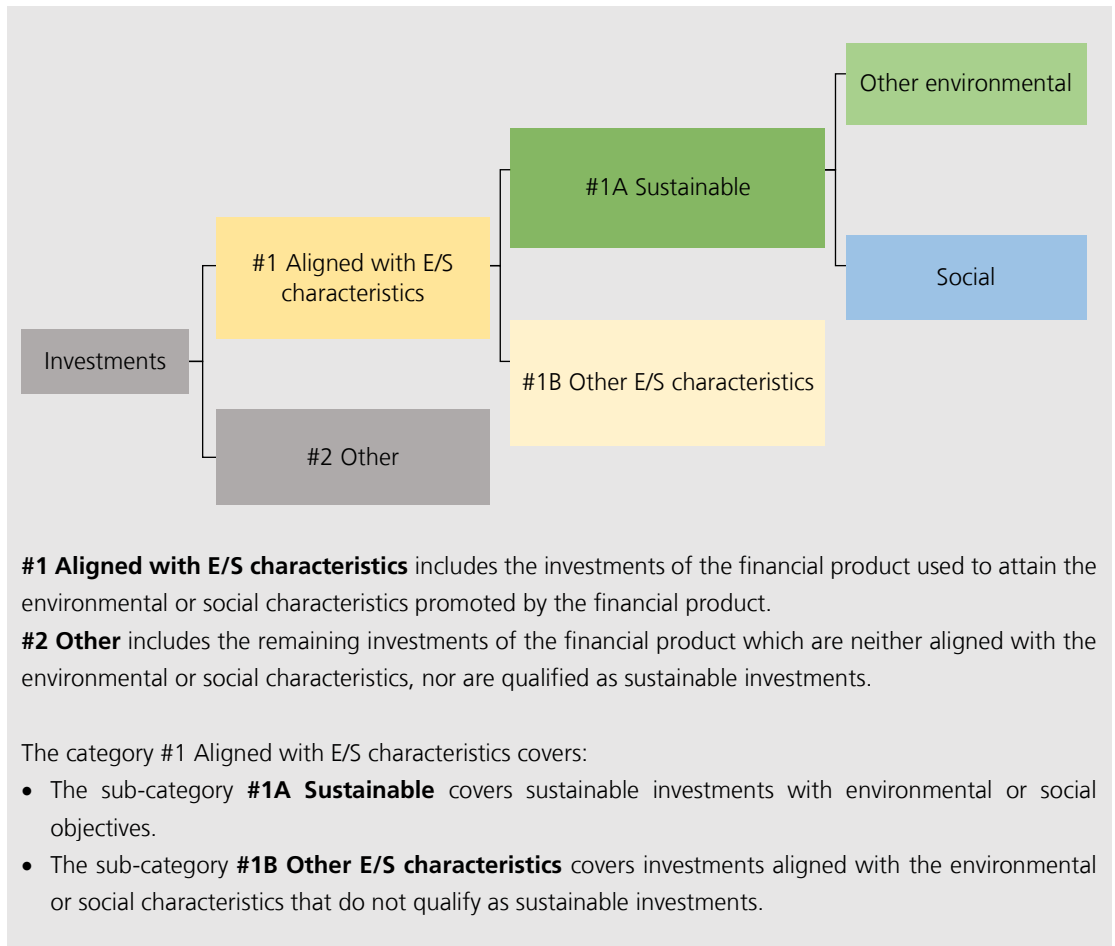
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.





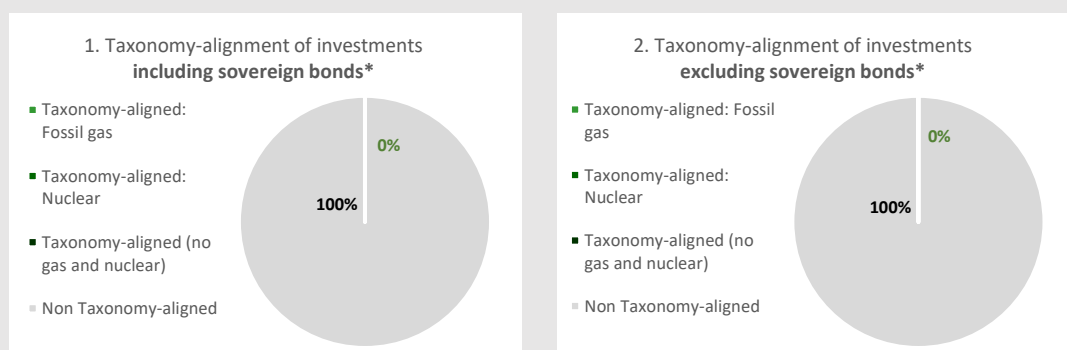
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU0230112046>.

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

## 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:

**Swisscanto (LU) Equity Fund Systematic Responsible USA**

Legal entity identifier: (LEI-Code):

**549300C6KO54K2Y4PI02**

Version:

**July 2023**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 \_\_\_\_\_5% 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**.



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

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, the reduction of CO<sub>2</sub>e intensity and sustainable investments.

**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 Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

#### **1. Exclusion criteria**

the Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact\*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)
- Coal reserves (excl. metals production)

\* In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of

time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

## **2. ESG integration**

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

## **3. Reduction of CO<sub>2</sub>e intensity**

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement.

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

## **4. Sustainable investments**

The Portfolio Manager also invests in the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs"). The products and services of companies (hereinafter "sustainable solutions") are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

Investments that no longer comply with the characteristics described in points 1-2 and 4 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2</sub>e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

● **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?**

The Portfolio Manager uses its SDG research to focus on securities which, based on its assessment, make a positive contribution to the SDGs. This means, for example, a company offering products and/or services that make a contribution to one or more of the SDGs.

● **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?**

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

The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts (hereinafter "PAIs")). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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:*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.

*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,  
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of sustainable investments, exclusion criteria, the reduction of CO<sub>2</sub>e intensity and ESG integration, and directly in the calculation of PAI scores.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.
- No



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

The fund invests at least 80% of its assets in the equity securities of companies whose registered office or primary business activities are in the USA. The selection of assets within the investment universe is based on a proprietary quantitative model.

- ***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 Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

#### **1. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **2. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive

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

contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund is lower or equal to the weight of all positions in ESG Laggards of the Sub-Fund's Benchmark.

### **3. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

### **4. Sustainable investments**

The Portfolio Manager invests inter alia in securities which, based on its assessment, make a positive contribution to the SDGs. The sustainable solutions of companies are examined with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs. For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

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

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.



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

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

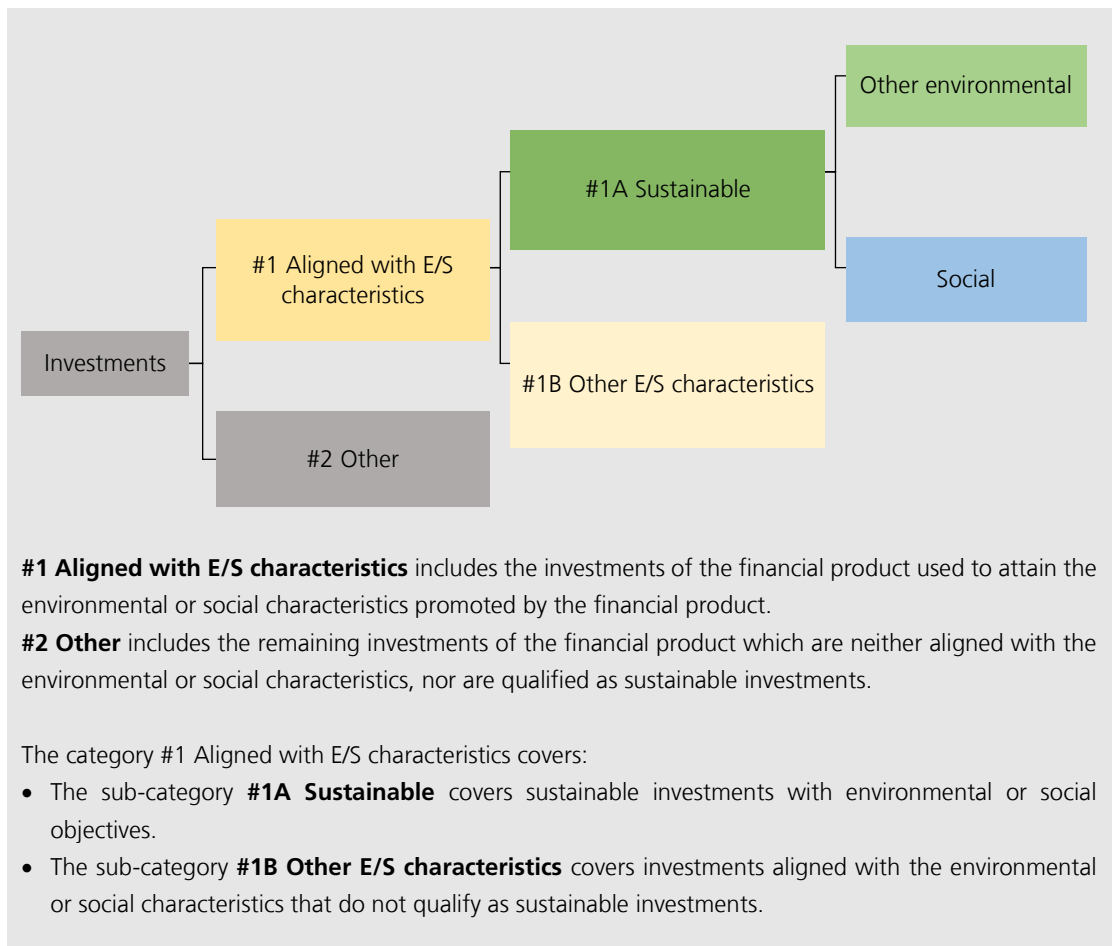
**Good governance**  
practices include  
sound management  
structures, employee  
relations,  
remuneration of staff  
and tax compliance.



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

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

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



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

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



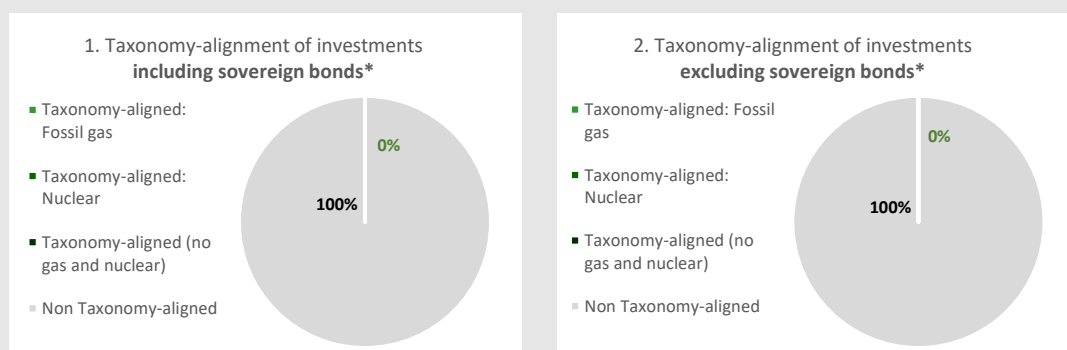
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% of the portfolio. The fund does not pursue a sustainable investment aligned with the EU Taxonomy.

### 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

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?

0% of the portfolio.

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.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



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

2.5% of the portfolio.



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

2.5% of the portfolio.



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

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



**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?**

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



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

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU0644935826>.

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

## Pre-contractual disclosure

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:

**Swisscanto (LU) Equity Fund Sustainable Europe**

Legal entity identifier (LEI-Code):

**391200U60040Q88QVF86**

Version:

**July 2023**

**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**: 20%

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**: 30%

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will 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**.



## ***What is the sustainable investment objective of this financial product?***

The primary sustainable investment objective of this financial product is the reduction of CO<sub>2</sub> emissions (quota of 80%) within the meaning of Article 9(3) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

### **1. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity for the portfolio is focused on a continuous reduction in the CO<sub>2</sub>e intensity of investments in accordance with the Paris Climate Agreement. The Portfolio Manager does not rely on an external reference benchmark aligned with the targets of the Paris Climate Agreement to achieve this objective. Instead, the Portfolio Manager ensures, as part of the direct investment process, that the methodology requirements for EU Paris-aligned benchmarks under Delegated Regulation (EU) 2020/1818 are met, rather than the Paris climate target of 1.5 degrees, whereby: (i) greenhouse gas (GHG) emissions are reduced by at least 7.5% plus economic growth per annum; (ii) the weighting of green versus brown investments is at least four times that of the benchmark; and (iii) the exclusions of Delegated Regulation 2020/1818 are complied with.

In accordance with the active investment strategy without use of an external reference benchmark, the requirements of Delegated Regulation 2020/1818 in relation to exposure to climate-critical sectors and GHG intensity are not implemented in relative terms versus a benchmark, but by means of absolute objectives to reduce the CO<sub>2</sub>e intensity of investments (pursuit of a decarbonisation trajectory).

In calculating the decarbonisation trajectory, we do not use Scope 3 GHG emissions due to insufficient data quality and incomplete data coverage, whilst awaiting better data coverage.

### **2. Sustainable investments in accordance with Article 9(2) SFDR**

In addition to the reduction of CO<sub>2</sub>e intensity, the Portfolio Manager focuses on the securities of companies, which, based on its assessment, make a contribution to sustainable objectives (sustainable investment within the meaning of Article 2(17) SFDR) relating to one or more of the United Nations Sustainable Development Goals (hereinafter the "SDGs").

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

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

The Portfolio Manager uses a range of data points to measure the attainment of its sustainable investment objectives. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the sustainable investment objectives:

**1. Reduction of CO<sub>2</sub>e intensity**

CO<sub>2</sub>e intensity for companies is defined as CO<sub>2</sub>e emissions in relation to turnover (tonnes of CO<sub>2</sub>e per USD million of turnover). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO<sub>2</sub> equivalents – CO<sub>2</sub>e). Data of independent third parties is used to calculate CO<sub>2</sub>e intensity. The Portfolio Manager uses this data to calculate the relevant CO<sub>2</sub>e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

**2. Exclusion criteria**

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social values, or business activities that are considered high risk. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following activities correspond to the exclusions described in Delegated Regulation 2020/1818. The Portfolio Manager has also determined other additional activities which result in the exclusion of companies from the investment universe:

- The production of weapons and munitions, including the following banned weapons:
  - Cluster bombs and munitions
  - Anti-personnel and landmines
  - Biological and chemical weapons
  - Nuclear weapons systems
  - Nuclear weapons material
  - Enriched uranium
  - Blinding laser weapons
  - Incendiary weapons
  - Manufacture of war technology
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact.
- Child labour
- Production of pornography
- Coal mining
- Operation of nuclear plants
- Uranium extraction
- Production of nuclear reactors
- Genetic engineering: human medicine
- Production of tobacco products and cigarettes
- Alcohol production (> 5% turnover)
- Gambling (> 5% of turnover)
- Factory farming
- Coal reserves
- Operation of fossil fuel power plants
- Natural gas extraction
- Oil extraction
- Conventional car manufacturers that do not have a comprehensive strategy for the transition to the use of alternative more environmentally friendly motors
- Aircraft production
- Airlines
- Cruise ship operators
- Genetic engineering (release of GMOs)
- Unsustainable fishing and fish farming
- Unsustainable forestry management

### **3. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager focuses on the securities of companies, which, based on its assessment, make a contribution to sustainable objectives relating to one or more of the SDGs. The products and services of companies (hereinafter “sustainable solutions”). The turnover of companies is used to examine the proportion of business that has a positive or negative impact on one or more of the objectives.

If a sub-fund no longer complies with the characteristics described in point 1, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO<sub>2e</sub> intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

Investments that no longer comply with the characteristics described in points 2 – 3 are removed from the portfolio by an appropriate deadline.

The sub-fund does not use a reference benchmark to meet the described sustainable investment objectives.



**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?**

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

Issuers with a negative net contribution to the SDGs are removed from the investment universe of the financial product. The sub-fund also considers adverse impacts on sustainability factors (principal adverse impacts, hereinafter "PAIs"). The mandatory indicators in Annex I of the commission delegated regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 (hereafter "Annex I to Regulation (EU) 2019/2088") are used for this purpose. Issuers categorised by the Portfolio Manager as causing significant harm on the basis of PAIs are not included in 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?*

Any breaches of the following standards are considered when analysing investments for inclusion as sustainable investments: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPR), and the International Labour Organisation (ILO) Conventions. Serious breaches of these standards result in the exclusion of any sustainable investments of the issuer.



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

- Yes,  
The sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. Accordingly, issuers categorised by the Portfolio Manager as causing significant harm on the basis of a PAI rating are excluded from the investment universe.  
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.  
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



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

The fund invests at least 80% of its assets in equity securities of companies whose registered office or primary business activities are in Europe.

**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?**

#### **1. Reduction of CO<sub>2</sub>e intensity**

The Portfolio Manager's investment activity targets a continuous reduction in the CO<sub>2</sub>e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO<sub>2</sub>e emissions (at least 7.5% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO<sub>2</sub>e intensity of the sub-fund's assets is calculated by discounting the CO<sub>2</sub>e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (7.5%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

#### **2. Exclusion criteria**

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). These include the exclusions described in Delegated Regulation 2020/1818. The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

#### **3. Sustainable investments in accordance with Article 9(2) SFDR**

The Portfolio Manager invests in securities which, in its opinion, make a contribution to one or more sustainable objectives. The sustainable solutions of companies are assessed with regards to their contribution to the SDGs using the data of independent third-party providers. For this purpose, a proprietary model examines around 800 product and service solutions for their contribution to one or more of the SDG targets. This results in a matrix with 70 solutions for the 169 SDG targets or the 17 SDGs.

For this assessment, we verify what proportion of a company's turnover has a positive or negative impact on one or more of the SDGs. Qualitatively, this impact is divided into five categories and ranges from strongly positive, positive, neutral, negative to strongly negative. The contribution made to the SDGs is classified in one of five categories: strongly positive, positive, neutral, negative or strongly negative. For example, in the automotive sector, we consider electric vehicles to be a more climate-friendly transportation option (strongly positive) than hybrid vehicles (positive). Turnover is also classified according to its contribution to environmental or social objectives. Only turnover classified as making a positive or strongly positive contribution to the SDGs is categorised as sustainable investment. The turnover of issuers causing significant harm to environmental or social sustainable investment objectives cannot be included in the proportion of sustainable investment.

#### **4. Investments in SDG leaders**

When constructing the investment universe, the Portfolio Manager considers the securities of issuers whose products and services make a significant contribution to the SDGs ("SDG leaders"). A significant contribution means at least 66.67% of turnover from a sustainable solution with a strongly positive contribution, or 33.33% of turnover from a sustainable solution with a positive contribution. In exceptional cases, an issuer may qualify as an SDG leader if it produces a key component of a sustainable solution, even if the 66.67% or 33.33% threshold is not met. As a result of the turnover requirements for inclusion in the investment universe, SDG leaders generally account for a high proportion of sustainable investments in accordance with Article 9(2).

#### **5. Investments in ESG leaders**

For the purposes of diversification, the Portfolio Manager also includes securities in the investment universe that are assessed as above-average on a best-in-class basis relating to a sustainable economic approach using environmental, social and governance (ESG) criteria. These securities are referred to as ESG leaders. Proprietary ESG scores calculated by the Portfolio Manager for companies are used as the basis for identifying ESG leaders. These are based on the data of independent third-party providers and calculated using proprietary criteria, algorithms and weightings. The Portfolio Manager considers the relevance of ESG criteria with regards to sustainability risks and opportunities. The ESG scores calculated cover a scale of 0 to 100, whereby 0 is the lowest value, 50 the average, and 100 the best.

ESG leaders are companies with an ESG score  $\geq 50$ . In exceptional cases, ESG leaders may be defined on the basis of fundamental research even if their ESG score is under 50.

If an ESG leader generates turnover that qualifies as sustainable investment in accordance with Article 9(2) SFDR, this is also included in sustainable investments in accordance with Article 9(2) SFDR. However, as there is no minimum turnover requirement for ESG leaders, this typically represents a significantly lower proportion than for SDG leaders.

#### **6. ESG integration**

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution (opportunities) to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers based on proprietary ESG scores.

The weighting of all positions in ESG laggards in the sub-fund is the same or lower than the weighting of all positions in ESG laggards in the sub-fund's benchmark.

- ***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 and tax compliance.

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions. Any breach of these standards results in the exclusion of the issuer from the financial product's universe of investee companies.

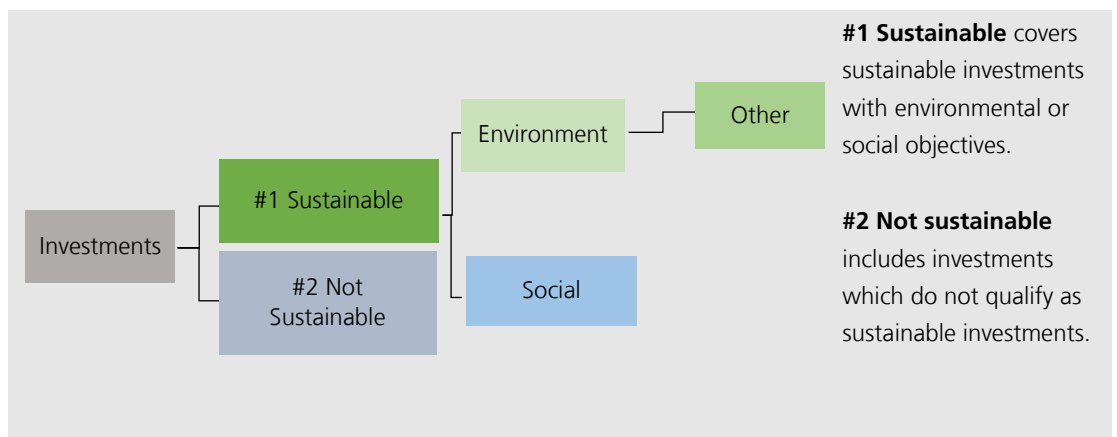


**What is the asset allocation and the minimum share of sustainable investments?**

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

The Portfolio Manager pursues the aforementioned sustainable investment objectives: (i) reduction of CO<sub>2</sub>e intensity in accordance with Article 9(3) SFDR; and (ii) sustainable investment in accordance with Article 9(2) SFDR. The reduction of CO<sub>2</sub>e intensity aligned with the 1.5-degree target of the Paris Climate Agreement is applied to 80% of the sub-fund's portfolio (excluding cash and derivatives).

The Portfolio Manager invests at least 50% of the net assets of the sub-fund in sustainable investments in accordance with Article 9(2) SFDR.



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

Derivatives are not used to achieve the sustainable investment objective.



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

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.

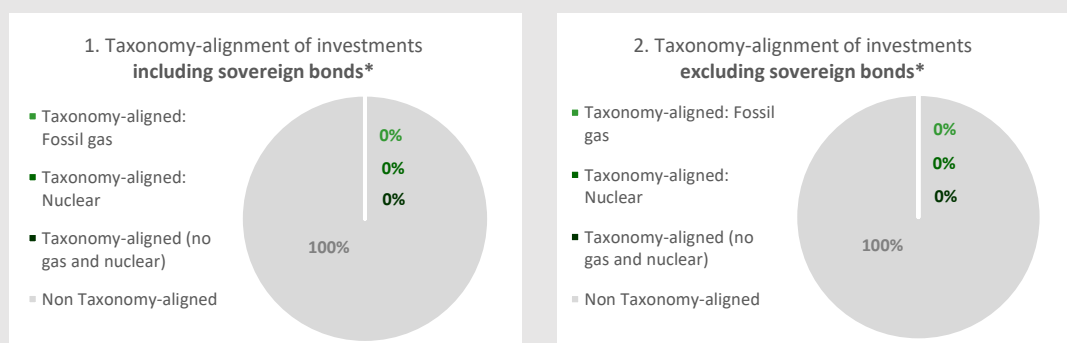
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

0% of the portfolio. The fund does not pursue sustainable investments aligned with the EU taxonomy.

### ● 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

**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?

0% of the portfolio.

<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 activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



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

The minimum proportion of sustainable investments with an environmental objective is 20% of the portfolio.



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

The minimum proportion of sustainable investments with a social objective is 30% of the portfolio.



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

Investments classified as “not sustainable” are all investments included in net assets after the deduction of sustainable investments. No investments other than sustainable investments are made. Derivatives and cash are excluded.



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

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

An index is not used as a reference benchmark to meet the sustainable investment objectives.



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

Further information on the product-related sustainability policy of the sub-fund can be found on the following website:

<https://products.swisscanto.com/products/product/LU2400052044>.

## 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:

**Swisscanto (LU) Equity Fund Small & Mid Caps Japan**

Legal entity identifier: (LEI-Code):

**549300B6H7H8TV6XMI68**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

Yes

No

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**: \_\_\_\_\_%

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 5% 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**.



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

The Fund promotes the following environmental and social characteristics:

### **Characteristic 1: Sustainable investment assessment**

While the Fund does not have as its objective a sustainable investment, it does assess the share of sustainable investments, by assessing the contribution of each underlying holding to one or multiple United Nations Sustainable Development Goals; whether the holding does not do significant harm to any environmental or social sustainable investment objective; and whether the holding follows good governance practices.

### **Characteristic 2: ESG risk and impact screening**

The Fund negatively screens for investments that:

- conflict with SPARX's exclusion policy (which outlines industries/activities that have potentially negative environmental or social characteristics – for more information, please refer to the binding elements section in this disclosure)
- are exposed to *unmanageable* sustainability risks
- are exposed to *unmanageable* controversies
- with principal adverse impacts are considered *unmanageable*

### **Characteristic 3: ESG integration to drive environmental and social progress**

The Fund integrates ESG considerations throughout the investment decision making process and the ownership period, including engagement in the form of coaching, to drive environmental and social progress within its holdings.

**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 Fund uses several indicators to measure the attainment of the environmental and social characteristics:

### **Characteristic 1: Sustainable investment assessment**

- Share of investments (% of NAV) that contribute to one or multiple United Nations Sustainable Development Goals ('SDGs'), split out by:
  - Share of investments (% of NAV) that contribute to SDGs with an environmental focus<sup>1</sup>
  - Share of investments (% of NAV) that contribute to SDGs with a social focus<sup>2</sup>
- Share of investments (% of NAV) that do not do significant harm to any environmental or social sustainable investment objective
- Share of investments (% of NAV) that follow good governance practices

<sup>1</sup> SPARX is aware that SDGs are heavily interconnected, and there is no such things as environmental or social SDGs. However, for the purpose of this assessment, SPARX consider the following SDGs to have a more environmental focus: SDG6: Clean Water and Sanitation; SDG7: Affordable and Clean Energy; SDG11: Sustainable Cities and Communities; SDG12: Responsible Consumption and Production; SDG13: Climate Action; SDG14: Life Below Water; SDG15: Life on Land

<sup>2</sup> SDGs with a social focus: SDG1: No Poverty; SDG2: No Hunger; SDG3: Good Health and Well-Being; SDG4: Quality Education; SDG5: Gender Equality; SDG8: Decent Work and Economic Growth; SDG9: Industry, Innovation and Infrastructure; SDG10: Reduced Inequalities; SDG16: Peace, Justice and Strong Institutions; SDG17: Partnerships for the Goals



- Share of sustainable investments (% of NAV) that contribute to one or multiple SDGs, do not do significant harm to any environmental or social sustainable investment objective, and follow good governance practices

### **Characteristic 2: ESG risk and impact screening**

The following sustainability indicators are used to assess the ESG risk and impact for each underlying holding.

- ESG Risk Rating<sup>3</sup>
- Occurrence and severity of controversies<sup>4</sup>
- Principal adverse impact indicators<sup>5</sup>

### **Characteristic 3: ESG integration to drive environmental and social progress**

To measure if underlying holding are realising environmental and/or social progress, the Fund uses the following indicators:

- Scope 1+2 carbon intensity<sup>6</sup>
- Share of investments (% of NAV) that express support to the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations

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<sup>3</sup> Source: Sustainalytics. The ESG Risk Rating score corresponds to the Sustainalytics ESG Risk Exposure Category of the Fund. This exposure is defined by Sustainalytics and considers a company's sensitivity or vulnerability to ESG risks. Where Sustainalytics does not provide coverage, SPARX will construct a proprietary ESG Risk Rating based on a bottom-up analysis of ESG data.

<sup>4</sup> Source: Sustainalytics. Sustainalytics' Controversies Research identifies companies involved in incidents and events that may pose a business or reputation risk to a company due to the potential impact on stakeholders or the environment. Controversies are rated on a scale from 1-5, with 5 denoting controversies that have the most severe impact to stakeholders and the environment. This rating is accompanied by an in-depth qualitative assessment.

<sup>5</sup> Source: combining data from several sources, including Sustainalytics, Trucost, and own research. Where data is not available, SPARX will apply a best efforts approach, for example by carrying out additional research, cooperating with other third-party data providers, or making reasonable assumptions and/or estimations.

<sup>6</sup> Source: Trucost, in Tonnes CO<sub>2</sub>e/USD mn. Trucost also provides data on Scope 3 carbon intensity, however, due to data quality considerations, SPARX chooses not to include this indicator.

● ***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?***

The Fund uses the United Nations Sustainable Development Goals ('SDGs')<sup>7</sup> as a reference for the sustainable investment objectives. The Fund does not focus on any of the SDGs in particular, as it believes that all SDGs are equally important and deeply interconnected.

In its analysis of the contribution of underlying holdings towards one or multiple of the 17 SDGs, SPARX identifies the relevant sub targets that the holding contributes to.<sup>8</sup> While the analysis is based on a high-level and desk-research based approach, the Fund ensures the analysis is carefully tracked, and a rationale for each selection is provided.

**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 the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

In its sustainable investment analysis, the Fund also assesses for each underlying holding, whether the investment does or may cause harm to any environmental or social sustainable investment objective. SPARX considers the sustainability indicators listed to measure the attainment of *Characteristic 2: ESG risk and impact screening*, including ESG risk ratings, occurrence and severity of controversies, and principal adverse impact indicators, when assessing whether the underlying holding may harm any other environmental or social objective.

In the case of doubt, the investment will not qualify as a sustainable investment.

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

The indicators for adverse impacts on sustainability factors are used as input for the sustainable investment analysis, to assess whether underlying holdings may harm any other environmental or social objective. After identifying and prioritising the adverse impacts, SPARX will assess what actions it can take and what targets it can set to mitigate those adverse impacts. When the principal adverse impacts are considered unmanageable, the Fund will consider excluding the investment.

Information on how principal adverse impacts have been considered, including how the indicators for adverse impacts on sustainability factors have been considered, will be disclosed in the Fund's annual report.

<sup>7</sup> Business cannot thrive unless people and planet are thriving. This includes ensuring that the world is on a path to meet all 17 Sustainable Development Goals. The 2030 Agenda for Sustainable Development (2030 Agenda), with 17 SDGs and 169 targets, is a plan of action for people, planet and prosperity. The SDGs are universal, transcend borders and apply across the workplace, marketplace and community. The SDGs are deeply interconnected – a lack of progress on one goal hinders progress on others.

<sup>8</sup> Source: combining data from several sources, including companies, Sustainalytics or Trucost, and own research. Where data is not available, SPARX will apply a best efforts approach, for example by carrying out additional research, cooperating with other third-party data providers, or making reasonable assumptions and/or estimations.

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

The fund excludes investments that are exposed to severe controversies, as assessed by Sustainalytics' Controversies Research. We monitor our investments for any violations or breaches of OECD Guidelines and UN Global Principles on Business and Human Rights and consider this as part of our investment decision-making process.



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

Yes,

SPARX considers principal adverse impacts of its investment decisions on sustainability factors, both when making investment decisions and when evaluating the existing portfolio (as described in the previous section). When making investment decisions, SPARX uses available data and information to inform a high-level assessment of the target investment's level of adverse impacts, and whether or not these impacts can be considered manageable.

Information on how principal adverse impacts have been considered, including how the indicators for adverse impacts on sustainability factors have been considered, will be disclosed in the Fund's annual report. SPARX will begin reporting on the indicators for adverse impacts on sustainability factors, as set out in Table 1 of Annex I of the Regulatory Technical Standards of the Regulation, by 30 June 2023 at the latest.

No



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

The investment objective of the Fund is to generate long-term capital growth along with an adequate return by identifying and acquiring undervalued Japanese equities by capitalizing on the Investment Manager's intensive in-house research expertise and extensive information network established through independent investment experience in Japan since 1989.

The fund invests at least 80% of its assets in the equity securities of small and mid-caps whose registered office or primary business activities are in the Japan region. The market capitalisation of the companies may not account for more than 2% of the market capitalisation of the entire share market in question. The Fund will normally invest at least 80% of its assets in equity securities of Japanese companies.

The Fund sees sustainability as a long-term driver for structural change and research shows that companies with sustainable business practices are more successful. The Fund therefore adheres to the approach of building a portfolio by selecting individual stocks through bottom-up research. The Fund emphasizes companies with high stakeholder value and economic value when selecting portfolio companies. These companies are able to generate stable, profitable, and growing profits by utilizing a solid business foundation built by rewarding not only shareholders but also customers, employees, business partners, local communities, the global environment, and other stakeholders. To identify such companies, the Fund incorporates non-financial information, such as ESG, in addition to financial information, into its research and analysis.

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 each of the environmental or social characteristics promoted by this financial product?**

The Fund uses several indicators to measure the attainment of the environmental and social characteristics:

**Characteristic 1: Sustainable investment assessment**

The share of sustainable investments in the fund (% of NAV, that contributes to one or multiple SDGs, do not do significant harm to any environmental or social sustainable investment objective, and follow good governance practices) should be at least 5%.

**Characteristic 2: ESG risk and impact screening**

The fund excludes investments that conflict with SPARX's exclusion policy:

- *Product-based exclusions:* The fund excludes, from the scope of investment, businesses with a strong negative impact on society, and businesses whose main sales are derived from controversial business lines that are unsuitable for investment in terms of either stakeholder value or economic value, or both<sup>9</sup>.

<sup>9</sup> Product-based exclusions:

- Adult Entertainment: The Funds exclude companies deriving 10% or more of their sales from adult-entertainment / pornography-related activities.
- Alcohol: The Funds exclude companies that generate 10% or more of its sales from the production of alcohol. Retailers are also limited to the 10% threshold.
- Conventional Oil & Gas: The Funds exclude companies that generate more than 10% of revenues from oil & gas sales. Oil & gas is defined as companies operating in the exploration, production, refining, transportation and/or storage of oil & gas assets.
- Gambling: The Funds exclude companies that generate 10% or more of its sales from gambling and/or the production of gambling related components.
- Power Production: The Funds are allowed to invest in utilities that have: 1) power generation by coal < 10%; 2) power generation by oil and gas < 10%; 3) power generation by nuclear < 10%
- Thermal Coal and Coal Generation: The Funds exclude mining companies that generate 10% or more of their revenues from thermal coal, and power producers that generate 10% or more of their revenues from thermal coal. Irrespective of this threshold, companies that are expanding their thermal coal and/or coal generation businesses are excluded.
- Tobacco: The Funds exclude companies where 10% or more of its sales are derived from the production of tobacco and related components. Retailers are also limited to the 10% threshold.
- Unconventional Oil & Gas: The Funds exclude oil & gas companies that are active in unconventional oil and gas extraction. Types of unconventional considered: 1) arctic drilling; 2) shale oil/gas; 3) tar sands. Thresholds: a. revenue share < 10%; b. no expansion plans.
- Controversial Weapons: The Funds exclude companies with activities related to the production of controversial weapons, defined as the direct or indirect involvement in the production, manufacture, and sale of weapons that can have a disproportionate and indiscriminate impact on civilian population including anti-personnel mines, cluster munition, depleted uranium and biological & chemical weapons.

- *Conduct-based exclusions:* The fund excludes, from the scope of investment, businesses with that have been through any conduct-based issues<sup>10</sup> in the past, and that have not been able to confirm that the issue has been completely resolved, is unlikely to recur, and will endeavor during the investment period to engage for improvement.

In addition, the fund excludes investments that that are exposed to severe controversies, as assessed by Sustainalytics' Controversies Research. In cases where a violation or breach has occurred, SPARX assesses how recently it occurred, the severity of the violation of the breach, and what actions were taken to remedy this feed into our assessment of current governance practices. Exposure to controversies is continuously monitored by the portfolio managers. Besides the effect of the controversy itself, as above, we also consider the company's response to a controversial event. Where the company has used this as a learning experience to improve the robustness of its governance and controls, we would view this in a positive light.

Finally, the fund also excludes investments that are exposed to sustainability risks or cause principal adverse impacts that are considered unmanageable. Whether sustainability risks or principal adverse impacts are considered unmanageable is a discretionary decision made by the Fund.

### **Characteristic 3: ESG integration to drive environmental and social progress**

No binding elements available.

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

The fund pursues an active investment strategy without a reference universe. It is not possible to quantify the minimum rate of change in the extent of investable assets.

- 
- Military Contracting and Small Arms: The Funds exclude companies that generate 10% or more of its sales from Military Contracting and/or the production of small arms. This is defined as the involvement in the production, research and development, management / services / maintenance, integration or customization, testing and/or sales / trade of weapons of war that are the subject to arms export regulations

<sup>10</sup> Conduct-based exclusions:

- Companies critical of protecting human rights or complicit in human rights violations
- Companies that exclude the formation of labour unions and/or collective bargaining or practice forced labour, child labour, and/or discrimination in workplace/jobs
- Companies that are critical of prevention of environmental problems or hinder the dissemination of environmental technologies
- Companies that engage in extortion or corruption
- Companies that sacrifice biodiversity
- Companies with a negative impact on water resources
- Companies that intentionally evade taxes
- Company with an autocratic governance system

● **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 and tax compliance.

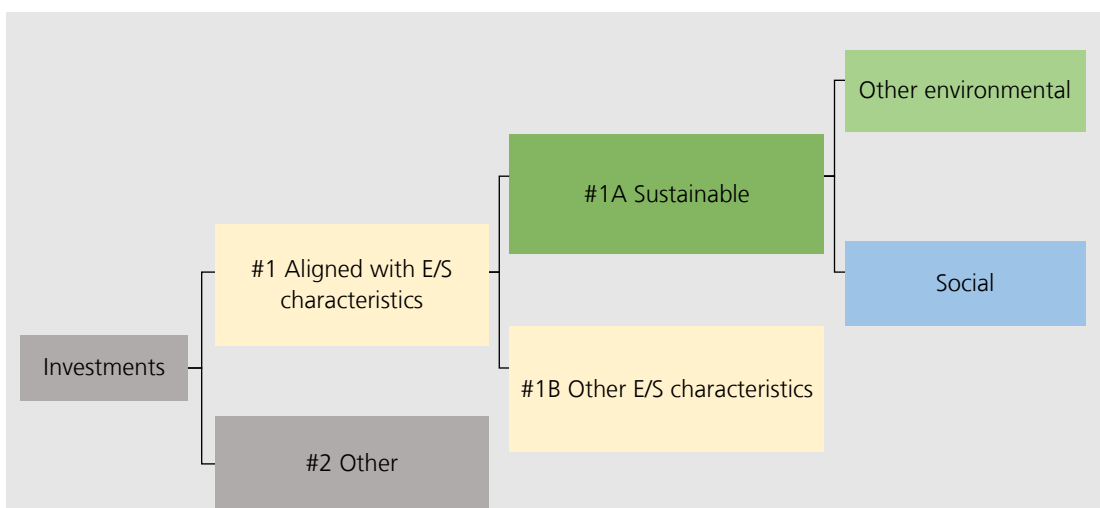
In its sustainable investment analysis, the Fund also assesses for each underlying holding, whether the investment follows good governance practices (such as sound management structures, employee relations, remuneration of staff, and tax compliance).

Analysis of good governance practices begins already pre-investment and continues throughout the holding period of the investment through our engagement activities. Elements that are taken in consideration include, but are not limited to, the track record, experience, diversity and composition (e.g. share of independent directors) of board and management, controversies (covering accounting and taxation, and corporate governance), employee relations, remuneration of staff, and tax compliance. The analysis is based on publicly available information and/or direct dialogue with the management teams of portfolio companies.



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

All investment decisions within Fund are made according to the binding elements of the investment strategy used to attain the listed environmental and social characteristics of the Fund. While the fund does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

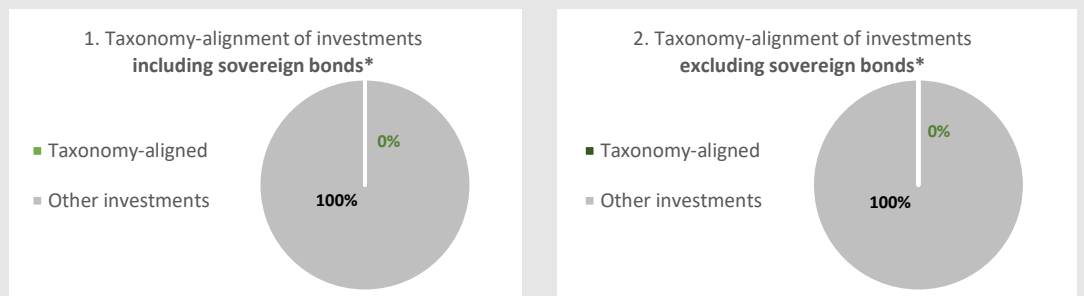
Derivatives are only used, if any, to a limited extent for hedging purposes and do not pursue any environmental and/or social characteristics.



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

0% of the portfolio. The fund does not pursue sustainable investments in line with the EU taxonomy.

**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?**

0% of the portfolio.



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

The Fund does not focus on a minimum share of environmentally or socially sustainable investments, as long as the combined figure is at least 5% of the portfolio.  
The minimum share of environmentally sustainable investments should be of approximately 2.5%.



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

The Fund does not focus on a minimum share of environmentally or socially sustainable investments, as long as the combined figure is at least 5% of the portfolio.  
The minimum share of socially sustainable investments should be of approximately 2.5%.



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

While the Fund aims to be fully invested, at times the Fund may hold cash for subscription redemption purposes. In case of cash holdings, minimum environmental and social safeguards are not relevant.



***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?***

No index has been determined as a benchmark to determine whether this financial product is aligned with the promoted environmental and/or social characteristics.



***Where can I find more product specific information online?  
Weitere produktspezifische Informationen sind abrufbar unter:***

More product-specific information can be found on the website:  
<https://products.swisscanto.com/products/product/LU0123487463>

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