



Article 10 (SFDR)
Website disclosure for an article 8 fund

Uni-Global – Equities Europe



Product Name: Uni-Global – Equities Europe	Legal identity identifier: 222100IYIX7FM1SELS07
Does this financial product have a sustainable investment objective?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: 90% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it had a proportion of __% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: __%	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments

A. Summary

For other languages, use following link:
<https://unigestionfile.blob.core.windows.net/public/5dd824e1-ba16-4be9-b6ce-565327596a2f.PDF>

The main characteristic promoted is to have an aggregate Greenhouse Gas (GHG) intensity (Scopes 1,2, and 3 emissions) at the portfolio level that is at least 20% lower than that of the MSCI Europe Index (the “Index”). In addition, the sub-fund will favour assets with higher or improving Environmental, Social and Governance (ESG) scores in order to achieve an overall ESG score better than the ESG score of the Index, whose stocks in the worse quintile have been removed. The Index is only used to determine the GHG intensity target and the ESG target of the sub-fund’s portfolio.

The sub-fund will also aim to maintain an aggregate level of carbon emissions (Scopes 1 and 2 emissions) that ensures the portfolio’s alignment with the 2-degree trajectory of the Science Based Target Initiative (“SBTi”).

The sub-fund employs a 4-pillar investment strategy to attain its environmental or social characteristics promoted, including

- (1) Pillar I: Norm-based screening based on the target companies’ compliance with international standards and norms,
- (2) Pillar II: Exclusionary screening based on various ESG aspects,
- (3) Pillar III: ESG guidelines aiming at identifying and positively tilting towards investee companies with better ESG scores, and negatively tilting away from the ones with the worst ESG scores, and



- (4) Pillar IV: Active ownership aiming at engaging with investee companies on ESG issues where there is a reasonable change of influencing their behaviors and positioning positively.

To measure the attainment of the environmental or social characteristics, the Investment Manager utilizes external ESG ratings, assessments and KPIs from external ESG data providers. The main sustainability indicator used to measure the Greenhouse Gas intensity of the portfolio companies is the GHG intensity (Scopes 1, 2 and 3 emissions) per million USD in revenues which is combined with the ESG score of portfolio companies which is used to achieve the higher ESG score at portfolio level. Furthermore, the CO2e indicator (Scopes 1 and 2 emissions) is used to measure the alignment with the 2-degree trajectory of the SBTi.

The Index does not take into account the environmental and social characteristics promoted by the sub-fund, which are expected to be achieved by the investment strategy of the Investment Manager.



B. No sustainable investment objective

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



C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

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Does this financial product take into account principal adverse impacts on sustainability factors?

Yes

No



D. Investment strategy

What investment strategy does this financial product follow?

Our ESG integration process has four pillars.

Step 1: Primary screenings:

1) **Pillar I**

- **Minimum social safeguards:** Companies identified as “non-compliant” based on UN Global Compact and OECD
- **Companies significantly involved in Predatory lending**
- **Companies involved in Controversial weapons**
- **Companies significantly involved in Adult entertainment production**
- **Tobacco producers**
- **Companies with significant thermal coal revenue exposure (>10%)**

2) **Pillar II**

- **Excessively large emitters of greenhouse gases**
- **Companies with no ESG criteria available**
- **Companies with ESG score below 60 and a negative trend**
- **Companies with severe controversial activity**

Step 2: Portfolio construction (**Pillar III: ESG guidelines**)

Portfolio construction is then performed through an optimisation process on the remaining, stable universe to produce a candidate portfolio that aims at minimising risk while considering a range of top-down guidelines. These guidelines reflect investment views such as country and sector risks as well as the ESG score of the aggregated portfolio. At this stage, by effectively favouring investments with higher ESG scores, we ensure an overall ESG score that is higher than the Index, whose stocks in the worse quintile have been removed and in majority of cases we aim for at least one decile based on rankings from our internal scoring methodology.

In addition, at the aggregated portfolio level, we ensure that the total GHG intensity (Scopes 1, 2, and 3) is, at least, 20% lower than that of the Index.

Furthermore, the aggregate portfolio carbon emissions (Scopes 1 and 2) will be maintained at a certain level while to ensure the portfolio’s alignment with the 2-degree trajectory of the Science Based Target Initiative (SBTi).

The resulting portfolio leads to a list of purchase candidates, which is then reviewed thoroughly by our portfolio managers and fundamental analysts. This review, although discretionary by nature, is highly disciplined and ESG is an integral part of the broader criteria used for validating the stocks within the portfolio. As this review may result in further exclusions, the last step may need to be repeated multiple times in order to find the optimal solution.

Step 3: Active ownership (**Pillar IV**)

As a responsible investor, we practice our active ownership in 3 levels: proxy voting, direct engagement (on topics discovered in our research to the companies and collaborative



engagement (already a signatory of Climate Action 100+, PRI-lead Oil & Gas, PRI’s Climate Change for Airlines and Aerospace Companies, Plastic Solutions Investor Alliance).

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 binding element of the sub-fund is that it will strive to reach all the goals set in the sustainability indicators table (and – if relevant - any additional goal set in the future, as further specified here) by applying the 4-pillar investment strategy as further described above.

How is the strategy implemented in the investment process on a continuous basis?

For Pillars I and II of the investment strategy, the asset manager performs the initial analysis, and the risk manager reviews the framework initially and implements pre- and post-trade checks on a daily basis.

For Pillar III of the investment strategy, the Asset Manager does the deep dive based on various info (ESG ratings, research and newspapers, dialogue with companies), the risk manager validates it via independent stress tests (climate risk), and performs standard checks based on investment guidelines.

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

We take into account ESG criteria in different layers of our decision-making process. As an active manager, we frequently review every stock held in our portfolios.

As part of our review, we focus on E, S & G criteria in order to determine the risk of our holdings with respect to any of these criteria.

All of the categories mentioned are considered within our G score and are regularly monitored. We assess the governance based on a pre investment rule of verifying the company is not non-compliant according to UNGC or OECD. We then monitor this fact on a daily basis through the risk management process and if the situation of any of our holdings changes, we will sell the position at most during next rebalancing of the sub-fund.

We also monitor the ongoing controversies on a daily basis, through the risk management process, for each company we hold and if there are severe controversies around governance, we sell the position at most during next rebalancing of the sub-fund.



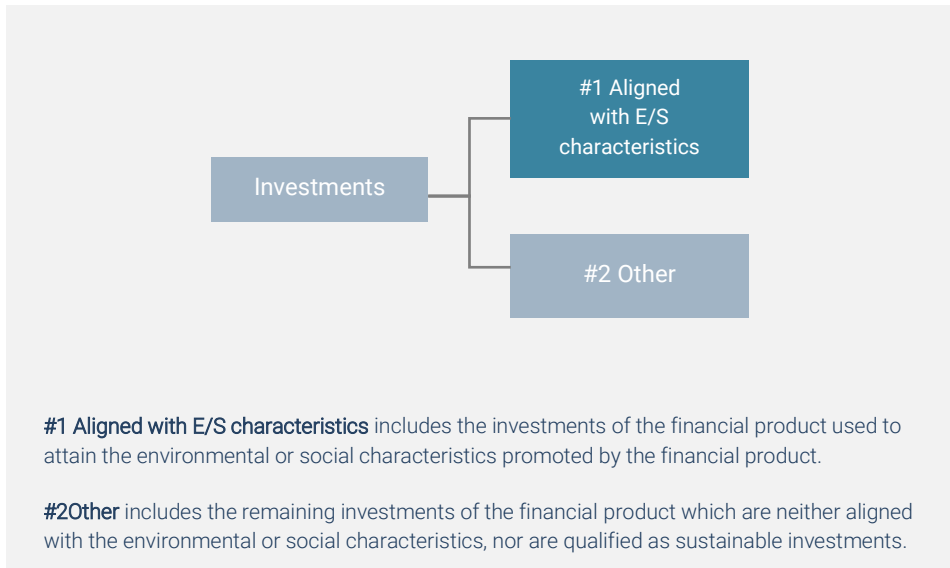
E. Proportion of investments

What is the planned asset allocation for this financial product?

The sub-fund is expected to invest at least 90% of its NAV in companies that qualify as aligned with E/S characteristics (#1).



The sub-fund is allowed to invest up to 10% of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).



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

1. Cash and cash equivalents for the purpose of liquidity
 2. Hedging instruments in order to reduce market risks
- Such investments do not follow any minimum environmental or social safeguards.



F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

KPI	Measure	Goal	Methodology
1. Relative Decarbonization	tCo2/mln\$ Revenue	=<80%* total GHG intensity level of the Index	Green House Gas (GHG) Intensity, which includes Scopes 1,2 & 3
2. Relative ESG Score Rank	unit	>=100%* ESG Score Rank of the Index whose stocks in the worse quintile	Environmental, Social and Governance combined score, based on an internal methodology. The ESG score is calculated from 0 to 100, 0 being the worst and 100 being the best. More information on the methodology may be found here: https://unigestionfile.blob.core.windows.net/public/922869b0-9540-4868-a56d-62a2ffbf58b0.PDF



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3. SBTI 2 Degree Alignment at Portfolio Level	tCO2e	<= 0 tCO2 Equivalen t to 2 Degree alignment	Forward looking emissions over/under budget versus 2-degree emission trajectory per mln \$ invested Aggregation on the portfolio level.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

The monitoring of these indicators is done on an ongoing basis throughout the lifecycle of the sub-fund. In addition, the Investment Manager has a dedicated Responsible Investment Committee which is sponsored by Investment Manager’s CEO that leads the development and integration of SRI principles into all the investment processes.



G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The methodology used to measure the attainment of the ESG characteristics promoted by the sub-fund is part of the third pillar of the investment strategy and supported through the continuous positive tilt toward investments with better ESG score and lower aggregate GHG intensity.



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

As data sources, the Investment Manager employs a combination of research, news, information gathered through dialogue with companies and data from external research providers including but not limited to Sustainalytics, S&P Trucost and Transition Pathway Initiative.

To measure the attainment of the environmental and social characteristics, the Investment Manager utilities external ESG ratings, assessments and KPIs from external ESG data providers. Prior to using external ESG data, the data source and the methodology of the external provider are assessed. Once the service provider is selected, their external data will never lead to the Investment Manager’s mechanistic reliance on that ESG assessment. Instead, the Investment Manager will use the external data as an additional, but not the sole,



source for the internal assessments. The following external ESG data sources are currently used:

- Sustainalytics
- Trucost
- ISS
- TPI
- IMF
- World Bank
- Witch Model



I. Limitations to methodologies and data

If any, what are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

The security selection can involve a significant element of subjectivity when applying ESG filters. Indeed, the way in which the sub-fund incorporates ESG factors in its investment processes may vary depending on the investment themes, asset classes, investment philosophy and subjective use of different ESG indicators governing the portfolio construction.

In addition, the extra-financial management process relies in part on data provided by external rating agencies, which may apply different models and which may contain inaccurate or incomplete data. In case of insufficient data, ESG data providers may rely on estimates and approximations using internal methodologies that may be subjective. These methodologies may also vary for each data provider. As the sub-fund rely in part on this data in making investment decisions, such uncertainty in data collection may negatively impact portfolio performance. In addition, it should be noted that the consideration of extra-financial data when constructing portfolios may lead to the exclusion of certain issuers and imply the foregoing of certain investment opportunities that would nevertheless be available to a fund not considering such data.



J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

Our aim of the strategy is to use a combination of quantitative and qualitative capabilities to identify a diversified set of candidate companies which aids investors to get exposure to a ESG conscious portfolio while controlling for various market risks and biases including crowding and valuation.

We create a ESG case for each of our candidate companies.

We use various company and external data sources to gather ESG relevant information for each candidate company (i.e., GHG emissions, Net Zero targets and Process, exposure to green or brown activities, physical risk assessment and so on). We also verify the fundamental characteristics and soundness of the company.



If all of the above steps collectively check out and agreed upon with the ESG working group during the preliminary review, we invest in the candidate company.

For objectives as drafted within our pre-contractual documents, as well as strict filters, the risk management independently verifies each, pre and post trade in order to confirm the compliance at stock level and portfolio level.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

Yes

No

If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

Step 3 (Pillar IV) of the investment strategy represents the sub-fund's engagement efforts. It entails that the sub-fund will seek to engage with companies on ESG issues where it is believed that there is a reasonable chance of positively influencing their behaviour and positioning.

The Investment Manager's proxy voting is carried out by the Investment Manager's proxy voting adviser called Institutional Shareholder Services (ISS) using an enhanced version of its International Sustainable Proxy Voting policy. The Investment Manager monitors the voting guidelines to ensure they are aligned with its approach to stewardship.

Engagement activities are directed by the Responsible Investment Committee (RIC) and conducted by the Corporate Engagement Team.

The engagement with the sub-fund's companies on a variety of Directors Related, Routine Business, Reorganisation and Merger, Health & Environment, Social/Human Rights, and Corporate Governance issues is done by writing a letter to corporate management voicing the concern and requesting that it be addressed. The intention is that this then sparks a dialogue with management through emails and phone conversations to clarify the RIC's position, personalise the engagement, and advocate for change. This includes proposals that affect:

- the composition, size, independence, election, removal and remuneration of the board of directors and committee members;
- appointment, remuneration and discharge of auditors; adoption of new articles of association;
- approval of charitable donations;
- approval of director/officer liability and indemnification;
- discussion on company's corporate governance structure;
- reorganisations and restructuring; mergers and acquisitions;
- initiation of share repurchase programme;
- approval of loan agreement; approval of transaction with a related party;
- adoption of proxy access rights;
- board diversity; climate change; community environmental impact;
- facility safety; phasing out nuclear facilities;
- review drug pricing or distribution; and
- review tobacco marketing.



L. Designated reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

- Yes
- No