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.

Product name: DNCA INVEST – BEYOND ALTEROSA **Legal entity identifier:** 2138006TR6VX6BNOSP19

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:** 0 % ☐ 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective:** 0%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

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

What is the sustainable investment objective of this financial product?

The Sub-Fund has as its objective sustainable investment within the meaning of Article 9 of SFDR. The Sub-Fund is managed taking into consideration responsible and sustainable principles and aims to be target issuers with a significatively exposure of percentage or their revenues to the 17 Sustainable Development Goals of the United Nations.

To be eligible to the investment universe, issuers must comply with the following criteria:

- minimum 5% revenues exposed to SDGs, according to the internal Taxonomy framework base on Sustainable Transition Activities (demographic transition, and/or healthcare transition, and/or economic transition, and/or lifestyle transition and/or ecologic transition).
- minimum rating of 4 out of 10 on Corporate Responsibility Rating (taking into account controversies and PAI) combined with the exclusion policy, integrating the Do Not Significantly Harm on any environmental or social objective (see below)
- minimum rating of 2 out of 10 on Governance (Corporate Governance Practices)

In this way, for private issuers, the investment process and resulting stock and bond picking take into account internal scoring with respect to both corporate responsibility and sustainability of companies based on an extra-financial analysis trough a proprietary tool developed internally by the Management Company, with the "best in universe" method. There may be a sector bias.

For public issuers, the investment process and resulting picking take into account internal scoring with respect to responsibility of public issuers such as country based on an extra-financial analysis trough a proprietary tool developed internally by the Management Company, with a minimum rating approach method.

The Sub-Fund does not use a benchmark for the purpose of attaining the sustainable objective of the Sub-Fund.

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

The sustainability indicators used by the Sub-Fund are for private issuers:

- The “Above and Beyond Analysis” (“ABA”, the proprietary tool) Corporate Responsibility Score: the main sustainability indicator used by the fund is the ABA scoring (see part “Investment Strategy”) based on the Corporate Responsibility and divided into four pillars: shareholder responsibility, environmental responsibility, employer responsibility, societal responsibility.
- The Transition to a Sustainable Economy Score: The Management Company complete this analysis by an assessment of companies’ exposure to “Transition to a Sustainable Economy”. This score is based on five pillars: demographic transition, healthcare transition, economic transition, lifestyle transition and ecologic transition
- Exposure to ONU Sustainable Development Goals: The Management Company assesses for each company the part of revenues linked to one of the 17 Sustainable Development Goals of United Nations
- Carbon data: carbon footprint (t CO_2/m$ invested) of the Sub-Fund’s portfolio,
- Carbon intensity (t CO_2/m$ revenues) of the Sub-Funds’ portfolio,

For public issuers, the sustainability indicators used are the following:

- The “Above and Beyond Analysis” (“ABA”, the proprietary tool): a dedicated model to rate public issuers based on four pillars: governance, environment, social and society.
- The Climate Profile: the Management Company complete this analysis by an assessment of issuers’ Climate Profile based on energy mix and evolution, carbon intensity and resources stock.
- Carbon data: carbon footprint (t CO_2/m$ debt) of the Sub-Fund’s portfolio,
- Carbon intensity (t CO_2/m$ GDP) of the Sub-Funds’ portfolio,

and the proportion of the Sub-Fund's portfolio in the controversial issuers based on several criteria such as: respect of freedom, child labor, human rights, torture practices, money laundering, etc.

How do sustainable investments 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.

The adverse impacts of the companies' activities on environment and social objectives are directly integrated into the ABA Corporate Responsibility Rating (which integrates the Principal Adverse Impacts) and may lead to a downgrading of the ABA scoring under the minimum rating.
On top of the integration of Principal Adverse Impacts in the ABA Corporate Sustainability Rating, the Management Company is implementing an "Adverse Impact on Sustainability Policy", and a "Climate Trajectory Policy".
In this background, the Management Company is implementing an Exclusion Policy.

- Thermal coal and unconventional oil and gas: the Management Company will gradually exclude companies implied in thermal coal and unconventional oil and gas
- Controversy weapons: issuers are excluded from all the Management Company portfolios
- Non-respect of UN Global Compact: issuers with severe breaches to UN Global Compact principles are integrated in the Management Company "Worst Offenders" list and excluded from all the portfolios.

The minimum rate of 4 of 10 (Corporate Responsibility in the proprietary tool ABA) is in line with the objective to Do No Significant Harm to the social or environmental objectives

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

Principal Adverse Impacts are part of the Key Performance Indicators (the "KPI") collected for the analysis. Issuers with severe Principal Adverse Impacts will be unfavourably noted by the ABA Corporate Responsibility Rating. A minimum rating of 4 out of 10 is thus consistent to the DNSH approach (Do No Significant Harm to the social or environmental objectives).

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

Issuers that do not comply with the principles of the United Nations Global Compact are unfavorably rated for Corporate Responsibility in the ABA tool.
Issuers with controversies or in severe breach to UN Global Compact Principles (example: human rights or fight against corruption) based on the internal approach are excluded from the portfolio through the worst offenders list after internal analysis.

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

✖ Yes

For private issuers, the Sub-Fund is taking into account the principal adverse impacts on sustainability factors.

- The Principal Adverse Impact analysis is part of the Corporate Responsibility Rating (See below)
- The Management Company is implementing a Adverse Impact on Sustainability Policy, measuring the PAI. The Policy first intend to monitor the contributions to climate change (CO2 emissions, CO2 intensity, implied temperature) in the context of the "Climate Trajectory" objectives.

For public issuers, the Sub-Fund is taking into account the principal adverse impacts on sustainability factors.

The Principal Adverse Impact analysis is part of the Country Rating (See below)

The Management Company is implementing an Adverse Impact on Sustainability Policy, measuring the PAI. The Policy first intend to monitor the contributions to climate change (CO2 intensity) and social issues (Country submitted to social violation, average income inequality score) and corruption (average corruption score).

Further information may be found in the annual report in respect of the Sub-Fund.

☐ No

What investment strategy does this financial product follow?

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

In line with a fundamental approach of the management team, the investment process is based on the following three stages:

- The first step is to exclude companies with high corporate responsibility risks (minimum score of 4/10 in the Management Company's proprietary model) This selection fulfills the conditions of the French SRI Label.
- The second step is based on the selection of companies identified to meet to Sub-Fund's sustainable strategy (i.e. reduction in carbon emission in view of achieving the long-term global warning objectives of the Paris Agreement),
- The third step is to build a portfolio pursuant to a fundamental analysis, the liquidity and the valuation of the companies considered.

As part of the promotion of such characteristics, the Sub-Fund will in particular consider the following ESG matters:

- Environment: GHG emissions, airborne pollution, waterborne pollution, water consumption, land use, etc.
- Social: Excessive CEO Compensation, gender inequality, health and safety issues, child labor, etc.
- Governance: Monitoring corruption and bribery, tax avoidance, etc.
- Global ESG quality rating.

The ABA scoring: proprietary tool of analysis and Corporate Responsibility Rating

Corporate responsibility is a useful information's pool used to anticipate companies' risks especially looking at the interplay with their stakeholders: employees, supply chains, clients, local communities, and shareholders…, regardless of the sector of activities.

The ABA analysis of corporate responsibility is broken down into four pillars:

- Shareholders responsibility (board of directors and general management, accounting practices and financial risks, etc.),
- - environmental responsibility (environmental footprint of the production chain and product life cycle or responsible supply, energy consumption and water consumption, company CO2 emissions and management of waste, etc.),
- responsibility towards workers ethics and working conditions of the production chain, treatment of employees – safety, well-being, diversity, employee representation, wages, quality of products or services sold, etc.) and,
- societal responsibility (Product quality, safety and traceability, respect of local communities and human rights, etc.

Each pillar is rated independently by the Management Company and weighted in accordance to how material it is for the targeted company. Each pillar is broken down into a set of criteria, selected in accordance with the materiality (correlation with the economic performance), which are around 25 in total. Those criteria can be quality of board assessment, CEO remuneration, impact on biodiversity, climate policy and energy efficiency, etc.

The sustainable transition focuses on the positive impacts' companies generate through their activities, products and services. The aim is to identify whether a company contributes sustainable transition. In the model, this pillar has been broken down into 5 major themes: demographic transition (inclusion of senior citizens, access to education, etc.), medical transition (access to care, medical diagnostics, control of endemic diseases, etc.), economic transition (infrastructure development, digitalization, access to connectivity, etc.), lifestyle transition (extension of product lifestyle, circular economy, sustainable mobility, etc.) and ecological transition (renewable energies, biodiversity, green mobility, etc.). Around 34 activities which contribute to the sustainable transition have been identified and integrated into the model.

Shareholder Responsibility	Respect for minority	Control structure
		Poison pill, limitation of votes
	Quality of Management	Size and composition of the ExCom
		Rotation of leaders, checks and balances
		Quality of the strategy
	Independence of Board and committees	Independence rate of the Board and its committees
		Separation of powers of the CEO/Chair
		Composition and size of the Board, fees and attendance
	CEO compensation	Transparence of compensation
		Variable compensation consistent with objectives and results

		ESG criteria in the variable compensation
	Accounting Risks	History of accounting irregularities (10 years)
		Change in accounting methods/reporting
		Independence of the statutory auditors
	Quality of financial reporting	Trust in guidance and transparency
		Profit warning history
		Access to management
Environmental Responsibility	Environmental management	Environmental Management System (EMS) and reporting scope
		Quality and consistency of reporting, quantified objectives
		Governance: dedicated director
	Climate policy and energy efficiency	Implementation of an energy efficiency policy
		Precise reporting and quantified objectives (scope 1, 2 and 3, CO2 emissions, carbon intensity)
	Regulation and certification	Perimeter of the environmental certification process
		Integration of regulations related to the sector
		Revenue associated with green/brown activities
	Impact on biodiversity and externalities	Management of positive contributions to biodiversity and reporting
		Integration of upstream issues in projects
		History of accidents or pollution
		Water consumption
		Waste recycling
Employer Responsibility	Corporate culture and HR management	HR's position in the company's hierarchy
		Leadership and culture type
		Distribution of full-time employees (FTEs)
		Employee share ownership
	Health and safety	Establishment of committees and procedures for hygiene, safety and working conditions
		Workplace accident history, lever of reporting (accident frequency, gravity, number of fatalities)
		Transparency and scope of indicators
	Labor relations and working conditions	Quality of social dialogue, average absenteeism, turnover rates
		History of employee conflicts
		Quality of working conditions and compliance with legislation
	Training and career management	Training pan and age pyramid
		Sector-specific transition issues
		Employee seniority and internal mobility policy
		Training budget, number of training

		hours/employee
	Promoting diversity	Share of women among employees
		Share of women on management teams
		Promotion of local managers
	Attractiveness and recruitment	Attractiveness of the sector and the company (Glassdoor rating, average salary/FTE)
		Talent attraction program
		Ability to hire people with key skills
Societal Responsibility	Product quality, safety and traceability	Product quality control process
		History of quality defects
		Consumer safety issues
	Innovation capacity and pricing power	Internal or external R&D management
		Employees dedicated to R&D, R&D budget
		Pricing power and brand power
	Supply chain management	Supply chain control and model (integrated or heavy outsourcing), limitation of cascading suppliers
		History of supply chain failure
		ESG included in the contracts with suppliers
	Customer satisfaction and market share gains	Customer satisfaction monitoring policy, change in market share
		Organic growth trends
		Quality of the B-to-B distribution network
		Customer complaint history
	Respect for local communities and human rights	Respect for human rights, facilitating the right to operate
		Integration of local communities
		History of local conflicts
	Cybersecurity & the protection of personal data	Use of personal data as a business model
		Protection of sensitive data and privacy
		Protection mechanisms against cyber attacks
	Corruption and business ethics	Governance and corruption prevention process
		Operations in high-risk countries
		History of corrupt or unethical practices
	Tax policy and practices	Alignment of the tax rate with the local economic presence
		Presence in tax havens
		Change in the tax rate over 10 years

Furthermore, the monitoring of the level of controversy is taken into account directly in the corporate responsibility and may affect the rating.
This in-depth analysis, combining qualitative and quantitative research, leads to a rating out of 10.

Moreover, with respect to investments in government bonds, this asset class is the of an extra-financial analysis in 7 dimensions comprising:

- Governance: Rule of law, Respect for freedoms, Quality of institutions and the regulatory framework
- Politics: Democratic life
- Health: Demography and Quality of life
- Education and training
- Social cohesion: Inequalities, Employment, Social protection
- The climate: risks and energy policy
- Ecosystems: resources and protection

Furthermore, the monitoring of the level of controversy is taken into account directly in the analysis and may affect the rating.
This in-depth analysis, combining qualitative and quantitative research, leads to a rating out of 10.

All investments in this asset class are subject to an in-depth analysis of these dimensions and of a rating that is taken into account in the investment decision.

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

The Sub-Fund implement its strategy within two types of bindings elements: exclusions applied for the whole of the Management Company, and exclusions specific to the strategy.
Exclusions applied for the whole of the Management Company:

- Exclusion based on United Nations Global Compact breaches: after analysis and decision by the Director of Management, companies are listed by the Management Company on a "worst offenders" list and excluded from all portfolios
- Exclusion related to the Management Company engagement to disinvest in non-conventional oil and gas activities and coal activities based on sector activities, according to the table below:

Activities	Exclusion from March 2022	Issuers having their registered office in the European Union or in the EOCD		Issuers having their registered office outside of the EOCD	
		Exclusion from December 2027	Exclusion from December 2027	Exclusion from December 2030	Exclusion from December 2040
Thermal Coal Production	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	Definitive exit (0% of the revenues)
Coal-based electricity generation	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	Definitive exit (0% of the revenues)

Activities		Exlcusion from December 2027	Exclusion from December 2027	Exclusion from December 2030	Exclusion from December 2040

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee

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

companies.

Activities	Exclusion from March 2022	Issuers having their registered office in the European Union or in the EOCD		Issuers having their registered office outside of the EOCD	
		Exclusion from December 2027	**Exclusion from December 2027**	**Exclusion from December 2030**	**Exclusion from December 2040**
Production of unconventional oil of gas	From 10% of the revenues	From 5% of the revenues	Definitive exit (0% of the revenues)	From 5% of the revenues	From 5% of the revenues

Exclusions specific to the strategy followed by the Sub-Fund:
- Exclusions of issuers which have a high-risk profile in terms of Corporate Responsibility (rating below 4 of 10),
- Sectorial exclusion as defined in the dedicated policy issued by the Management Company.

The Exclusions applied are binding on the Management Company.

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

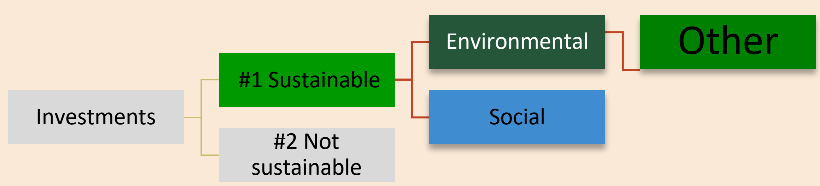
For private issuers, the Governance is one the assessment axes of the Corporate Responsibility: the Shareholder Responsibility. It is rated out of 10 based on 6 criteria: the quality of the management, the quality of the board and committees, the compensation of the CEO, the quality of the financial communication, the accounting risks and the respect for minority shareholders. Around thirty KPIs allow the assessment of the governance practices associated with these 6 criteria. In addition, controverses related to the good governance practices impact the overall rating.

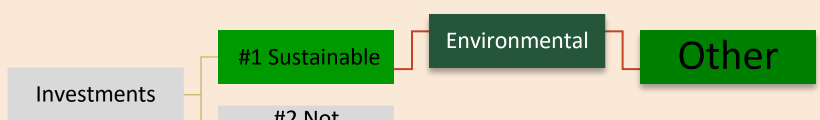
For public issuers, the Governance is one of the assessment axes. It is rated out of 10 based on 4 pillars: Rule of law and respect for freedoms, Quality of institutions and regulatory framework, Democratic life and Military status and defense. Around twenty KPIs allow the assessment of the governance practices associated with these 4 pillars.

Asset allocation describes the share of investments in specific assets.

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

The Sub-Fund intends to invest 80% minimum of the portfolio in "investments with environmental and social characteristics", 100% of those directly invested in "sustainable investments" ((excluding derivatives, cash, cash equivalent and money market funds).





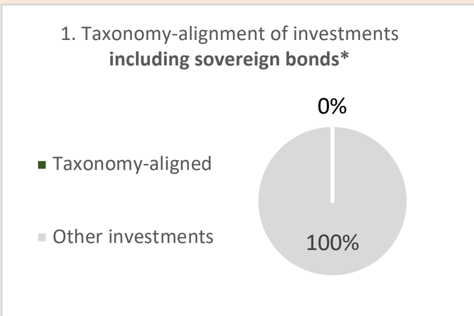
How does the use of derivatives attain the sustainable investment objective?

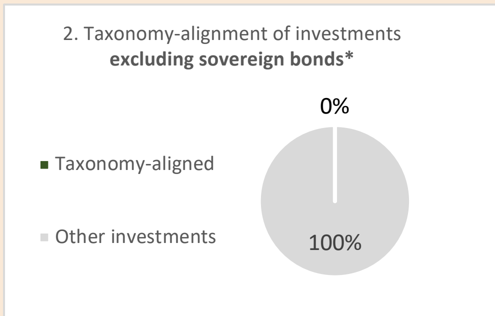
The Sub-Fund does not invest in derivatives in order to attain the environmental or social characteristics promoted by the financial product.

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

This Sub-Fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable activities. As at the date of this Prospectus, the Management Company expects that the proportion of the Sub-Fund's investments in taxonomy-aligned environmentally sustainable activities (including investments in enabling and transitional activities) amounts to 0%. As soon as data will become more accurate and available, it is expected that the proportion of investments in enabling and transitional activities will grow and that the calculation of the alignment with the Taxonomy Regulation be amended.

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*

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available ad among others have greenhouse gas emission levels corresponding to the best performance.

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

The minimum share of investments in transitional and enabling activities is expected to be 0%. This figure will be adjusted when the data will be available and accurate.

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 Sub-Fund do not set a minimum of share of sustainable investments with an environmental objective ("E" pillar") although the share of sustainable investments ("E" and/or "S" pillars) represents at least 100% of the direct investment (total assets excluding derivatives, cash, cash equivalent and money market funds) but are not qualify as environmentally sustainable under the EU Taxonomy. The underlying investments of this Sub-Fund which are not in taxonomy-aligned environmentally sustainable activities do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation.

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

The Sub-Fund do not set a minimum of share of sustainable investments with social objective ("S" pillar") although the share of sustainable investments ("E" and/or "S" pillars) represents at least 100% of the direct investment (total assets excluding derivatives, cash, cash equivalent and money market funds).

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

The Sub-Fund may invest in deposits at sight, money market funds, money market instruments, derivatives, and other deposits. Those Assets included under "#2 Not sustainable" do not prevent the Sub-Fund from attaining its sustainable investment objective as they may be used by the Management Company to manage the liquidity of the portfolio or to reduce any specific financial risk (for example: currency risk).

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

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

Not applicable.

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

N/A

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

N/A

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

N/A

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

N/A

Where can I find more product specific information online?

More product-specific information can be found on the website: https://www.dnca-investments.com/lu/funds/dnca-invest-beyond-semperosa/units/a-lu1907595398