

## SFDR – Website Product Disclosure

**Website product disclosure in respect of Article 10(1) of the 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 (“SFDR”), concerning the following financial product:**

**Product Name: LGT Funds SICAV – LGT Sustainable Money Market Fund (EUR) (the “Fund”)**

**Legal Entity Identifier: 5493006G6JC70PS8ZU84**

All capitalised terms herein contained shall have the same meaning in this SFDR – Website Product Disclosure as in the Prospectus for the Fund, unless otherwise indicated. For further details on the definitions used herein, please refer to the Prospectus for the Fund.

### (a) Summary

It is considered that the Fund meets the criteria in Article 8 of SFDR to qualify as an ESG Oriented Fund. This can be reassessed at any time. If it is determined at any future point that the Fund does not meet the criteria to qualify as an ESG Oriented Fund, the Fund supplement, which forms part of the prospectus (the “**Fund Supplement**”) and this Website Product Disclosure shall be updated accordingly.

The Fund will seek to achieve its investment objective by investing most of its assets in debt securities and instruments (debentures, bonds, fixed-rate securities, notes and others), as well as money market instruments issued by private and public-law debtors from all over the world, in term deposits and time deposits with banks in Lichtenstein, in any other member state of the EEA or in Switzerland as well as in units of other undertakings for collective investments in transferable securities and undertakings comparable to a UCITS which invest their assets in accordance with the investment policy (money market funds and/or money market funds with short maturities) of this Fund.

The Fund promotes environmental and/or social characteristics and at least 75% of the assets of the Fund will be allocated to investments aligned with environmental and/or social characteristics. While the Fund does not have sustainable investment as its objective, a minimum proportion of 20% of the assets of the Fund will be committed to sustainable investments with an environmental and/or social objective. In respect of corporate issuers, the Asset Manager also seeks to ensure that good governance practices are followed by such issuers in respect of the Fund.

Whether the Fund is attaining the environmental and/or social characteristics it promotes will be based on an assessment of whether the Asset Manager in respect of the Fund has successfully and consistently (i) executed its ESG exclusion policy (ii) applied its ESG rating system in the process to identify a universe of investable issuers and in the investment monitoring process, as well as whether it (iii) applied its policy relating to sustainable investments and the United Nations (“**UN**”) Sustainable Development Goals (“**UN SDGs**”).

The Asset Manager measures and monitors the environmental and/or social characteristics promoted by the Fund using multiple third-party ESG data sources. The Asset Manager also carries out several steps of due diligence on the individual investments.

While the Asset Manager strives to ensure the robustness of its ESG-related analyses, there may be certain limitations of data. However, it is not foreseen that these limitations significantly alter or affect the attainment of the environmental and/or social characteristics promoted by the Fund. In addition, the Asset Manager interacts with issuers through direct and indirect engagement.

The Fund has not designated a specific index as a reference benchmark to determine whether it is aligned with the environmental and/or social characteristics that it promotes.

### (b) No sustainable investment objective

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

A minimum proportion of 20% of the assets of the Fund will be committed to sustainable investments:

- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the Regulation on the Establishment of a Framework to Facilitate Sustainable Investment (Regulation EU/2020/852) as may be amended from time to time (the “**EU Taxonomy**”); or

- with a social objective.

In terms of ensuring that the sustainable investments do not cause significant harm to any environmental or social sustainable investment objective, a requirement for sustainable investments is the positive contribution to UN SDGs, which cover a broad set of ESG activities.

In addition, the portfolio is systematically screened for controversies across environmental and/or social issues as part of the Asset Manager's "do no significant harm" ("**DNSH**") assessment in respect of issuers as well as in respect of projects that are financed through the use of proceeds ("**UOP**") instruments. A sudden drop due to an ESG controversy will generally lead to an alert to be triggered so further assessment and action can be taken.

As an additional safeguard, the mandatory principal adverse impacts set out in Annex 1 of the regulatory technical standards supplementing the SFDR are used to further screen against activities that may significantly harm any of the environmental or social objectives, whereby investments that do not meet minimum thresholds applied by the Asset Manager for each of the mandatory principle adverse impact indicators in Annex 1 shall be excluded from investment consideration.

### Principal adverse impacts

Principal adverse impacts on sustainability factors are considered in the following manner:

- Principal adverse impact indicators are captured under the DNSH principle for sustainable investments outlined above and in the section entitled "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 section H of the Fund Supplement.
- Principal adverse impacts are assessed as part of the ESG rating system.
- Principal adverse impact indicators are reported on as outlined in the section entitled "Does this financial product consider principal adverse impacts on sustainability factors?" in section H of the Fund Supplement.

### Alignment with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

The Asset Manager monitors breaches and controversies for new and existing investments which largely relies on the quality of data supplied by external data providers.

Where the Asset Manager identifies clear breaches of norms outlined in the a) OECD Guidelines for Multinational Enterprises, b) the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work, and c) the International Bill of Human Rights the Asset Manager will seek to exclude the issuer from investment by the Fund. However, it cannot be guaranteed that all investments, especially in jurisdictions where data scarcity is pronounced, can be assessed and thereby excluded.

## (c) Environmental or social characteristics of the financial product

The Fund promotes environmental and social characteristics, as it seeks to take into account ESG related factors in the asset selection and investment consideration and/or monitoring process in the following ways:

**ESG Exclusion Policy:** Exclusions are applied in the investment selection process based on ESG factors as a means of promoting environmental and social characteristics. Different factors apply to companies and to governments as the issuer of the instruments.

For example, the following companies are excluded from investment consideration:

- Companies that, to the best of the Asset Manager's knowledge, generate any revenue from *inhumane weapons*; and
- Companies that generate a significant amount of their revenue from certain industries or business activities deemed by the Asset Manager to be controversial (e.g. *arms, tobacco, pornography, nuclear power production, coal*).

For example, countries are excluded from investment consideration based on the below criteria:

- if the country has not signed certain international treaties on *controversial weapons*;
- if the country fails to meet basic requirements with respect to *human rights* and *democracy* (assessed among other things based on Freedom House Index, rating of the Reporters Without Borders Press Freedom, ratification of conventions and treaties in respect of human rights and labour conditions);
- if the country has a high level of corruption (assessed among other things based on Transparency International Corruption Perception Index and if a country's military budget exceeds 4% of gross domestic product);
- if the country is subject to sanctions under Art 41 of the UN security council to *eliminate terrorism and weapons proliferation, oppose human rights violations or violations of international treaties, money laundering and deliberate*

*destabilization of sovereign countries and drug trafficking; or*

- if the country is considered a jurisdiction with strategic AML/CFT deficiencies by the Financial Action Task Force (“**FATF**”).

**ESG Rating:** The following are key performance indicators on ESG factors related to an issuer that are included in the ESG cockpit, which is a proprietary tool used as part of the ESG rating system discussed below, in the process to identify a universe of investable issuers through a systematic process which relies on information from underlying issuers (and are therefore promoted as environmental and/or social characteristics by the Fund):

- In respect of companies as issuers: *greenhouse gas emissions, energy consumption, water and sanitation, natural resources and biodiversity, waste and emissions, labour conditions, health and safety, human resources, diversity, education, suppliers, community relations and product impact.*
- In respect of supranational organisations as issuers: *controversial practices, business ethics & product responsibility, environmental principles and action plans, community & human rights.*
- In respect of countries as issuers: *CO2 intensity, biodiversity and resources, corruption and business climate, public spending for education.*

## (d) Investment strategy

In seeking to achieve the investment objective, the Fund will invest most of its assets in debt securities and instruments (debentures, bonds, fixed-rate securities, notes and others), as well as money market instruments issued by private and public-law debtors from all over the world, in term deposits and time deposits with banks in Lichtenstein, in any other member state of the EEA or in Switzerland as well as in units of other undertakings for collective investments in transferable securities and undertakings comparable to a UCITS which invest their assets in accordance with the investment policy (money market funds and/or money market funds with short maturities) of this Fund.

The Fund integrates environmental and / or social characteristics as part of its investment process, as outlined in this Website Product Disclosure.

### Good governance practices

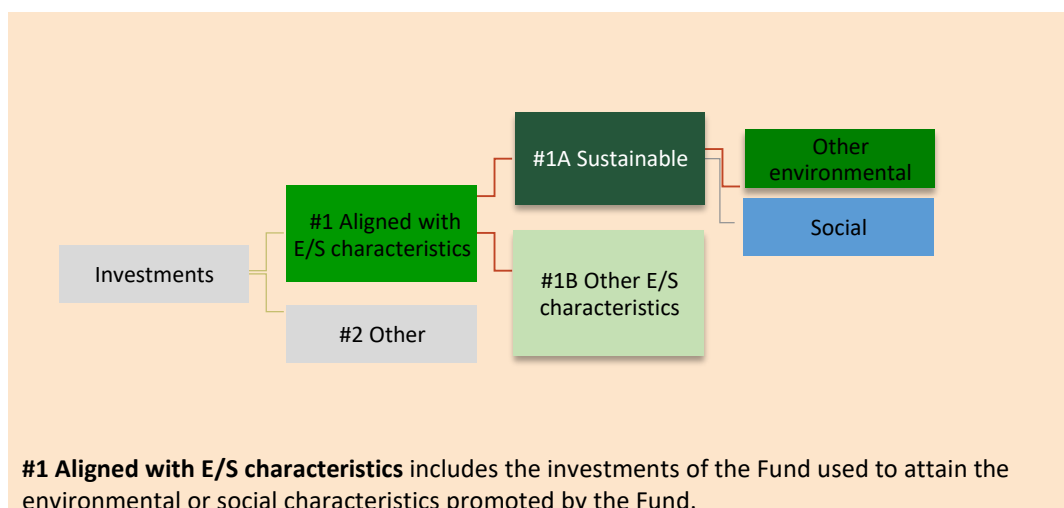
The Fund will typically focus on exposure to a broad range of fixed income securities and instruments.

In the context of exposure to corporate issuers, in order to ensure that such issuers follow good governance practices, as reasonably determined by the Asset Manager, the Asset Manager’s quantitative screening of corporate governance, which relies on information from underlying companies, considers the independence and competency of investee company boards in terms of leadership and composition, existing and independent key committees, the degree of integration of long-term and ESG related targets, and minority shareholder protections. In addition, good governance is a factor in the qualitative assessment of individual companies prior to investment.

## (e) Proportion of investments

At least 75% of the assets of the Fund will be allocated to investments aligned with environmental and/or social characteristics (#1). At least 20% of the assets of the Fund will be committed to sustainable investments (#1A). The minimum environmental and social safeguards and the purpose of the remaining portion of investments are outlined in section H of the Fund Supplement.

The below graphical representation contextualises the types of investment considered.



**#2 Other** includes the remaining investments of the Fund 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.

The Fund does not use derivatives specifically for the purpose of attaining the environmental and or social characteristics it promotes. Rather, the Fund may use derivatives for ordinary purposes, as outlined in the Fund Supplement, that is, for investment purposes, hedging and/or for efficient portfolio management purposes and in certain cases this may therefore incidentally relate to the Fund attaining the environmental and or social characteristics it promotes.

## (f) Monitoring of environmental or social characteristics

The Asset Manager has in place internal control and governance mechanisms to measure and monitor the environmental and/or social characteristics promoted by the Fund on an ongoing basis. Such measuring and monitoring includes regular reporting of key ESG parameters and current ESG positioning in respect of the Fund. The monitored ESG parameters are subject to change and can be reassessed from time-to-time, however, the Asset Manager expects continuous improvements to lead to such reassessments and subsequently further improvement of its ESG monitoring capabilities over time.

Reporting in terms of the monitoring of environmental and/or social characteristics promoted by the Fund will take place as part of the SFDR periodic reporting.

ESG parameters may be considered by the Fund's auditor in annual financial audits.

Whether the Fund attains the environmental and/or social characteristics it promotes is based on an assessment of whether the Asset Manager in respect of the Fund has successfully and consistently applied and executed the sustainability indicators as described in section (g) "Methodologies for environmental or social characteristics".

## (g) Methodologies for environmental or social characteristics

- **ESG Exclusion Policy.** The first factor contributing to whether the Fund will be considered to be attaining the environmental and/or social characteristics it promotes will be an assessment of whether the Fund has successfully and consistently executed its ESG exclusion policy. Different exclusion factors apply to companies and to governments as the issuer of the instruments, as described within section (c) "Environmental or social characteristics of the financial product".
- **Screening based on ESG Rating.** Another factor contributing to whether the Fund will be considered to be attaining the environmental and/or social characteristics it promotes will be an assessment of whether the Fund has successfully and consistently applied its ESG rating system in the process to identify a universe of investable issuers in the investment monitoring process.

The ESG rating serves as a main indicator in addition to traditional credit metric to identify risks and opportunities that are not yet factored in the current prices and are expected to impact the spreads negatively.

In respect of companies and supranationals as issuers, the application of the ESG rating screening process is applied to the total universe of such issuers analysed through the Asset Manager's proprietary rating tool and the lowest scoring 25% of companies and supranationals analysed, in terms of their ESG score, are excluded from investment consideration. It should be noted that the range of companies and supranationals analysed through the Asset Manager's proprietary rating tool may be wider than the target investment universe of the Fund, meaning that the actual amount of investments excluded from the Fund's scope of investments may effectively be a minimum rate that is lower than 25%.

Investors should note that the screening and reduction of 25% of lowest scoring companies and supranational issuers does not apply to countries as issuers.

The following are key performance indicators on ESG factors related to an issuer that are included in the ESG cockpit in the process to identify a universe of investable issuers through a systematic process which relies on information from underlying issuers:

- In respect of companies as issuers: *greenhouse gas emissions, energy consumption, water and sanitation,*

*natural resources and biodiversity, waste and emissions, labour conditions, health and safety, human resources, diversity, education, suppliers, community relations and product impact.*

- In respect of supranational organisations as issuers: *controversial practices, business ethics & product responsibility, environmental principles and action plans, community & human rights.*
- In respect of countries as issuers: *CO2 intensity, biodiversity and resources, corruption and business climate, public spending for education.*
- **Sustainable Investments.** The aggregate weight of sustainable investments held by the Fund shall be calculated and used to measure the attainment by the Fund of the environmental and/or social characteristics it promotes. In order for an investee entity to be considered a sustainable investment, it must be assessed by the Asset Manager as meeting the following criteria: (i) it must contribute to an environmental or social objective (which may be assessed on the basis of alignment of such investments with the UN SDGs, as considered further below); (ii) it must do no significant harm to any other environmental or social objective; and (iii) it must follow good governance practices. At least 20% of the assets of the Fund will be committed to sustainable investments.
- **UN SDGs.** Sustainable investments of the Fund target a combination of environmental and social objectives across the spectrum based on the alignment of such investments with the UN SDGs. Thus, another factor contributing to whether the Fund is attaining the environmental and/or social characteristics it promotes will be an assessment of whether the Fund has successfully and consistently applied its policy relating to investing in sustainable investments. The Asset Manager considers as sustainable investments, which are aligned with SFDR, only instruments which either:
  - qualify as a Green, Social or Sustainable UOP instrument according to the principles of the International Capital Markets Associations (“**ICMA**”), which align with UN SDGs, or
  - have a positive net contribution to UN SDGs by virtue of the issuer’s net SDG score, based on the outputs from the ESG rating system. For the avoidance of doubt, the net positive SDG score, and therefore the level of sustainable investments, is determined on the basis of how an investment contributes, in terms of a total impact contribution (which includes an analysis of products, services and operational alignment) to an environmental or social objective.

## (h) Data sources and processing

The Asset Manager may rely on third-party ESG data or research providers to produce any ESG-analysis.

The Asset Manager has developed a proprietary ESG rating system based on external data providers that provides objective, relevant and systematic ESG information. The ESG rating provides a ranking based on ESG criteria, whereby issuers within the investment universe with more attractive ESG values are scored more highly than others. Issuers are first scored across the environmental, social and governance themes. These scores are then combined into an overall ESG score.

Third-party ESG data is further used to implement the ESG exclusion criteria and to derive a UN SDG impact score.

The main third-party ESG data sources used by the Asset Manager are: Refinitiv, MSCI, ISS ESG, RepRisk and Sustainalytics (non-exhaustive):

- For the ESG Exclusion Policy, the Asset Manager primarily uses data from MSCI, supplemented by Refinitiv and RepRisk and controversial weapons data from Sustainalytics
- For the ESG Rating, the Asset Manager primarily uses data from Refinitiv, supplemented by RepRisk, ISS ESG and MSCI.
- In respect of UN SDGs, the Asset Manager primarily uses data from ISS ESG, Refinitiv, MSCI and RepRisk.

The Investment Manger continuously assesses the availability and quality of third-party data and may use new or different third-party providers, if deemed appropriate or necessary. Third-party data is frequently sourced and updated. The quality of automated and manual data is plausibility checked and periodic checks are executed to ensure consistency and reliability.

Investors should note the sourced data may occasionally include estimated data, which may be inaccurate. It is currently difficult to fully specify the proportion of estimated data as information about a certain proportion of estimated data is not made available by the third-party ESG data sources used by the Asset Manager.

## (i) Limitations to methodologies and data

The Asset Manager strives to ensure the robustness of its ESG-related analyses through stringent quality checks of third-party vendors. The aim of the Asset Manager is to have a high calculation accuracy, which leads to meaningful results. However, there are certain limitations which may impact the reliability of such assessment:

- The Asset Manager relies on third-party data for its calculations. Such data or research may be imprecise, incorrect or unavailable and the resulting analysis or use of such data by the Asset Manager may be impacted.

- Sourced data may be outdated or there might be a significant time discrepancy between the period of time such data relates to and the actual reported date of such data.
- There might be differences in the definition and methodologies used to compile data used by third-party providers, impacting the comparability of the results.

While the Asset Manager recognises these limitations, it is not foreseen that these limitations significantly alter or affect the attainment of the environmental and/or social characteristics promoted by the Fund given that a lot of the data used is typically rather static, as it does not tend to be subject to rapid change, and quality checks are performed to assure a reasonable level of accuracy of the data used. Data providers are engaged with on a regular basis to fully comprehend any data-related specifications and/or identified anomalies.

## (j) Due diligence

The Asset Manager carries out several steps of due diligence on an ongoing basis in respect of the individual investments:

- The quality of third-party input data is checked and assessed to ensure accuracy relating to a specific investment.
- Investment professionals engage on fundamental as well as ESG-related research on individual investments and verify or, if required, adjust the quantitative data used.
- Internal risk management-related checks are carried out to ensure compliance with investment restrictions and consistent alignment with the binding elements relating to the Fund.

## (k) Engagement policies

The Asset Manager applies a comprehensive active ownership policy to the Fund, which includes interactions with issuers through engagement, including the following:

### **Direct Engagement**

- The Asset Manager aims to establish and maintain ongoing dialogue with issuers on topics related to the attainment of the Fund's strategy and investment objective.
- The Asset Manager engages directly with issuers on arising sustainability related controversies (reactive engagements), as well as clearly defined topics related to the environmental and/or social characteristics promoted by the Fund (proactive engagements).

### **Indirect Engagement**

- The Asset Manager engages with issuers indirectly through its active participation in industry associations or organizations on sustainability related topics that partake in dialogue with issuers. The Asset Manager is committed to being an active collaborator and thought leader on ESG-related issues, which is further demonstrated through its participation in UN Principles for Responsible Investment, the Institutional Investors Group on Climate Change and the Climate Action 100+ initiative.

## (l) Designated reference benchmark

The Fund has not designated a specific index as a reference benchmark to determine whether it is aligned with the environmental and/or social characteristics that it promotes.



## Annex

### (a) Zusammenfassung

Es wird davon ausgegangen, dass der Fonds die Kriterien in Artikel 8 der Offenlegungsverordnung erfüllt, um als ESG-orientierter Fonds eingestuft zu werden. Dies kann jederzeit neu beurteilt werden. Wenn zu einem zukünftigen Zeitpunkt festgestellt wird, dass der Fonds die Kriterien für die Einstufung als ESG-orientierter Fonds nicht erfüllt, werden die Fondsergänzung, die Teil des Prospekts ist (die „**Fondsergänzung**“), und diese Website-Produktangaben entsprechend aktualisiert.

Zur Erreichung seines Investitionsziels investiert der Fonds den überwiegenden Teil seines Vermögens in Schuldtitel und -instrumente (Schuldverschreibungen, Obligationen, festverzinsliche Wertpapiere, Schuldscheine u. a.) sowie in Geldmarktinstrumente privater und öffentlich-rechtlicher Schuldner aus aller Welt, in Termineinlagen und Festgelder bei Banken in Liechtenstein, in jedem anderen Mitgliedstaat des EWR oder in der Schweiz sowie in Anteile an anderen Organismen für gemeinsame Anlagen in Wertpapieren und an einem OGAW vergleichbaren Organismen, die ihr Vermögen gemäß der Anlagepolitik dieses Fonds anlegen (Geldmarktfonds und/oder Geldmarktfonds mit kurzer Laufzeit).

Der Fonds bewirbt ökologische und/oder soziale Merkmale und mindestens 75 % der Vermögenswerte des Fonds werden Investitionen zugewiesen, die auf ökologische und/oder soziale Merkmale ausgerichtet sind. Obwohl der Fonds keine nachhaltigen Investitionen anstrebt, verpflichtet er sich, einen Mindestanteil von 20 % der Vermögenswerte des Fonds in nachhaltige Investitionen einem ökologischen und/oder sozialen Ziel zu investieren. In Bezug auf Unternehmensemittenten ist der Asset Manager außerdem bestrebt, sicherzustellen, dass diese Emittenten in Bezug auf den Fonds Verfahrensweisen einer guten Unternehmensführung einhalten.

Ob der Fonds die von ihm beworbenen ökologischen und/oder sozialen Merkmale erreicht, basiert auf einer Beurteilung, ob der Asset Manager in Bezug auf den Fonds erfolgreich und konsequent (i) seine ESG-Ausschlusspolitik umgesetzt hat, (ii) sein ESG-Ratingsystem bei der Identifizierung eines Universums investierbarer Emittenten und bei der Anlageüberwachung angewandt hat und ob er (iii) seine Politik bezüglich nachhaltiger Investitionen und die Ziele für nachhaltige Entwicklung der Vereinten Nationen („**UN**“) („**UN SDGs**“) angewandt hat.

Der Asset Manager misst und überwacht die vom Fonds beworbenen ökologischen und/oder sozialen Merkmale mithilfe mehrerer externer ESG-Datenquellen. Der Asset Manager führt außerdem verschiedene Due-Diligence-Maßnahmen für die einzelnen Investitionen durch.

Obwohl der Asset Manager bemüht ist, die Robustheit seiner ESG-bezogenen Analysen sicherzustellen, kann es bestimmte Einschränkungen bei den Daten geben. Es ist jedoch nicht vorgesehen, dass diese Einschränkungen die Erreichung der vom Fonds beworbenen ökologischen und/oder sozialen Merkmale erheblich verändern oder beeinflussen. Darüber hinaus interagiert der Asset Manager mit Emittenten durch direkte und indirekte Engagements.

Der Fonds hat keinen bestimmten Index als Referenzwert festgelegt, um festzustellen, ob er an den von ihm beworbenen ökologischen und/oder sozialen Merkmalen ausgerichtet ist.

### (a) Sammenfatning

Det vurderes, at fonden opfylder kriterierne i artikel 8 i SFDR og kvalificerer sig som en ESG-orienteret fond. Dette kan til enhver tid revurderes. Hvis det på et senere tidspunkt vurderes, at fonden ikke opfylder kriterierne for at være en ESG-orienteret fond, vil fondstillægget, der er en del af prospektet ("**fondstillægget**"), og disse produktoplysninger på webstedet blive opdateret i overensstemmelse dermed.

Fonden søger at opnå investeringsmålet ved at investere de fleste af aktiverne i gældsværdipapirer og gældsinstrumenter (selskabsobligationer, obligationer, fastforrentede værdipapirer, gældsbeviser med mere) såvel som pengemarkedsinstrumenter udstedt af private og offentlige debitorer over hele verden, i tidsindskud og aftaleindskud hos banker i Liechtenstein, i en anden EØS-medlemsstat eller Schweiz samt i enheder af andre institutter for kollektiv investering i værdipapirer og institutter, der kan sammenlignes med et investeringsinstitut, som investerer sine aktiver i overensstemmelse med investeringspolitikken (pengemarkedsfonde og/eller pengemarkedsfonde med kort løbetid) for denne fond.

Fonden fremmer miljømæssige og/eller sociale karakteristika, og mindst 75 % af fondens aktiver vil blive allokert til investeringer, der er i overensstemmelse med de miljømæssige og/eller sociale karakteristika. Selvom fonden ikke har bæredygtige investeringer som mål, vil mindst 20 % af fondens aktiver blive investeret i bæredygtige investeringer med et miljømæssigt og/eller socialt mål. Formueforvalteren søger også at sikre, at de virksomhedsudstedere, der investeres i, følger god ledelsespraksis i forbindelse med fonden.

Om fonden opnår de miljømæssige og/eller sociale karakteristika, den søger at fremme, vil være baseret på en vurdering af, om formueforvalteren på fondens vegne succesfuldt og konsekvent har (i) eksekveret fondens ESG-udelukkelsespolitik, (ii) anvendt fondens ESG-vurderingssystem i forbindelse med at identificere et univers af investerbare udstedere og i overvågningen

af investeringer, samt om den har (iii) anvendt sin politik for bæredygtige investeringer og FN's verdensmål for bæredygtig udvikling ("FN's bæredygtighedsmål").

Formueforvalteren måler og overvåger de miljømæssige og/eller sociale karakteristika, fonden fremmer, ved hjælp af flere ESG-datakilder fra tredjeparter. Formueforvalteren udfører endvidere flere due diligence-trin for de enkelte investeringer.

Selvom formueforvalteren stræber efter at sikre robuste ESG-relaterede analyser, kan dataene have visse begrænsninger. Det forudses imidlertid ikke, at disse begrænsninger i væsentlig grad vil ændre opnåelsen af de miljømæssige og/eller sociale karakteristika, som fonden fremmer. Derudover interagerer formueforvalteren med udstederne via direkte og indirekte engagement.

Fonden har ikke udpeget et specifikt indeks som referencebenchmark for at fastslå, om den er i overensstemmelse med de miljømæssige og/eller sociale karakteristika, som den fremmer.

## (a) Resumen

Se considera que el Fondo cumple los criterios del artículo 8 del SFDR, por lo que puede considerarse un Fondo orientado a características ESG. Podrá volver a analizarse en cualquier momento. Si en algún punto del futuro se determinara que el Fondo ya no cumple los criterios para poder considerarse un Fondo orientado a características ESG, el suplemento del Fondo, que forma parte del folleto (el «**Suplemento del Fondo**») y estas divulgaciones sobre el producto en el sitio web se actualizarán en consecuencia.

El Fondo tratará de lograr su objetivo de inversión invirtiendo la mayor parte de sus activos en valores e instrumentos de deuda (obligaciones, bonos, valores de renta fija, pagarés, etc.), en instrumentos del mercado monetario emitidos por deudores privados y de derecho público de todo el mundo, en depósitos a plazo y depósitos a plazo con bancos de Liechtenstein, de cualquier otro Estado miembro del EEE o de Suiza, así como en participaciones de otros organismos de inversión colectiva en valores mobiliarios (OICVM) y organismos comparables a un OICVM que inviertan sus activos con arreglo a la política de inversión (fondos del mercado monetario o fondos del mercado monetario con plazos de vencimiento cortos) de este Fondo.

El Fondo promueve características medioambientales o sociales, y al menos el 75 % de sus activos se asignará a inversiones ajustadas a características medioambientales o sociales. Aunque el Fondo no tiene como objetivo la inversión sostenible, una proporción mínima del 20 % de los activos del Fondo se dedicará a inversiones sostenibles con un objetivo medioambiental o social. Con respecto a los emisores corporativos, el gestor de activos también trata de garantizar que los emisores apliquen prácticas de buena gobernanza con respecto al Fondo.

Se valorará si el Fondo está logrando las características medioambientales o sociales que promueve mediante una evaluación del papel satisfactorio y constante del gestor de activos del Fondo en torno a (i) la ejecución de su política de exclusión por criterios ESG; (ii) la aplicación de su sistema de calificación de factores ESG en el proceso de identificación de un universo de emisores en los que se puede invertir y en el proceso de supervisión de las inversiones, y (iii) la aplicación de su política relativa a las inversiones sostenibles y los Objetivos de Desarrollo Sostenible de las Naciones Unidas («**ODS de la ONU**»).

El gestor de activos mide y supervisa las características medioambientales o sociales que promueve el Fondo utilizando distintas fuentes de datos ESG de terceros. El gestor de activos también aplica distintas medidas de diligencia debida a las inversiones individuales.

Aunque el gestor de activos procura garantizar la solidez de sus análisis relacionados con criterios ESG, los datos pueden tener ciertas limitaciones. Sin embargo, no se prevé que estas limitaciones alteren el resultado o afecten significativamente al logro de las características medioambientales o sociales que promueve el Fondo. Además, el gestor de activos interactúa con los emisores a través de una implicación directa e indirecta.

El Fondo no ha designado un índice específico como índice de referencia para determinar si se ajusta a las características medioambientales o sociales que promueve.

## (a) Sintesi

Si ritiene che il Fondo soddisfi i criteri di cui all'articolo 8 dell'SFDR per essere classificato come Fondo orientato ai fattori ESG. Questo giudizio può essere rivalutato in qualsiasi momento. Qualora in futuro si ritenga che il Fondo non soddisfi i criteri per essere classificato come Fondo orientato ai fattori ESG, il supplemento del Fondo, che costituisce parte integrante del prospetto (il "**Supplemento del Fondo**") e la presente Informativa sul prodotto per il sito web saranno aggiornati di conseguenza.

Il Fondo cercherà di raggiungere il suo obiettivo d'investimento investendo la maggior parte dei suoi attivi in titoli e strumenti di debito (obbligazioni, bond, titoli a tasso fisso, notes e altri), nonché in strumenti del mercato monetario emessi da debitori privati e pubblici di tutto il mondo, in depositi a termine e depositi vincolati presso banche in Liechtenstein, in qualsiasi altro Stato Membro dello SEE o in Svizzera, nonché in quote di altri organismi d'investimento collettivo in valori mobiliari e in organismi comparabili ad un OICVM che investono i loro attivi conformemente alla politica d'investimento di questo Fondo (fondi del mercato monetario e/o fondi del mercato monetario a breve scadenza).





Il Fondo promuove caratteristiche ambientali e/o sociali e almeno il 75% degli attivi del Fondo sarà allocato a investimenti allineati alle caratteristiche ambientali e/o sociali. Sebbene il Fondo abbia come obiettivo un investimento sostenibile, una quota minima del 20% degli attivi del Fondo sarà impegnata a favore di investimenti sostenibili con un obiettivo ambientale e/o sociale. Con riferimento agli emittenti societari, l'Asset Manager cerca inoltre di garantire che gli stessi rispettino prassi di buona governance con riferimento al Fondo.

Per stabilire se il Fondo rispetta le caratteristiche ambientali e/o sociali che promuove si valuterà l'efficacia e coerenza dell'Asset Manager del Fondo (i) nell'implementare la sua politica di esclusione ESG; (ii) nell'applicare il proprio sistema di rating ESG nel processo di identificazione dell'universo di emittenti investibili e nel processo di monitoraggio degli investimenti, nonché (iii) nell'applicare la sua politica in materia di investimenti sostenibili e Obiettivi di sviluppo sostenibile delle Nazioni Unite ("UN") ("UN SDG").

L'Asset Manager misura e monitora le caratteristiche ambientali e/o sociali promosse dal Fondo utilizzando più fonti di dati ESG di terzi. L'Asset Manager esegue inoltre diverse procedure di due diligence sui singoli investimenti.

Sebbene l'Asset Manager si adoperi per garantire la solidità delle proprie analisi ESG, potrebbero esservi alcune limitazioni dei dati. Tuttavia, non si prevede che tali limitazioni alterino o influenzino in modo significativo il rispetto delle caratteristiche ambientali e/o sociali promosse dal Fondo. Inoltre, l'Asset Manager interagisce con gli emittenti attraverso attività di impegno dirette e indirette.

Il Fondo non ha designato un indice specifico come indice di riferimento per determinare il proprio allineamento alle caratteristiche ambientali e/o sociali che promuove.