

## 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 Quality Funds – LGT Sustainable Short Duration Corporate Bond Fund Hedged (the "Fund")**

**Legal Entity Identifier: 549300TJDW1UFX0EPV72**

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 9 of SFDR to qualify as an ESG Focused 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 Focused Fund, the Fund supplement, which forms part of the prospectus (the "**Fund Supplement**"), and this Website Product Disclosure shall be updated accordingly.

The Fund aims to invest in issuers that positively contribute to the United Nations ("**UN**") Sustainable Development Goals ("**UN SDGs**"), thus pursuing a sustainable investment objective of positively contributing to the UN SDGs through a combination of environmental objectives (such as climate change mitigation and pollution prevention and control) and social objectives. The Fund will seek to achieve its investment objective by investing (either directly or indirectly) primarily in fixed income securities and to a lesser extent in other securities.

When selecting investments for the Fund, the Asset Manager (a) undertakes an environmental, social and governance ("**ESG**") analysis of the investment universe in order to attain the sustainable investment objective of the Fund and (b) conducts a fundamental analysis of asset classes, sectors and issuers.

At least 75% of the assets of the Fund will be allocated to sustainable investments which combines the allocation to assets with social objectives and assets with environmental objectives. 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.

Whether the Fund is attaining its sustainable investment objective will be based on an assessment of whether 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 companies and in the investment monitoring process, as well as whether it (iii) applied its policy relating to sustainable investments and UN SDGs.

The Asset Manager measures and monitors the elements required in order to attain the environmental objective of the Fund using multiple third-party ESG data sources and 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 sustainable investment objective. In addition, the Asset Manager applies a comprehensive active ownership policy to the Fund, which includes interactions with issuers through direct and indirect engagement.

The Fund uses the Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index (the "**Performance Benchmark**") for performance measurement purposes only. The Performance Benchmark is a mainstream index and does not take account of ESG factors and is therefore not consistent with the sustainable investment objective of the Fund. Accordingly, the Fund has not designated a specific index as a reference benchmark to determine whether it meets the sustainable investment objective.

## (b) No significant harm to the sustainable investment 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 the 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" 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 "do no significant harm" principle for sustainable investments as outlined in the section entitled "How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?" in the SFDR Annex of the Fund Supplement.
- Principal adverse impact indicators are assessed in the exclusion of securities as part of the ESG rating system as outlined in the section entitled "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?" in the SFDR Annex of the Fund Supplement.
- 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 the SFDR Annex 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 investee company 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) Sustainable investment objective of the financial product

The investment objective of the Fund is to achieve adequate constant returns while positively contributing to the UN SDGs, thus pursuing a sustainable investment objective through a combination of environmental objectives (such as climate change mitigation and pollution prevention and control) and social objectives.

## (d) Investment strategy

The Fund will seek to achieve the investment objective by investing primarily in a broad range of debt securities and instruments (such as bonds, including inter alia inflation-linked, high-yield or convertible bonds, credit linked notes, treasuries and money market instruments (including certificates of deposit, floating rate notes and fixed or variable rate commercial paper and in cash denominated in such currencies as the Asset Manager may determine)) listed or traded on a recognised exchange and issued by private or public debtors globally.

When selecting investments for the Fund, the Asset Manager (a) undertakes an ESG analysis of the investment universe in order to attain the sustainable investment objective of the Fund and (b) conducts a fundamental analysis of asset classes, sectors and issuers.

Please refer to section of the Fund Supplement titled "Investment Strategy" for further details.

### **Good governance practices**

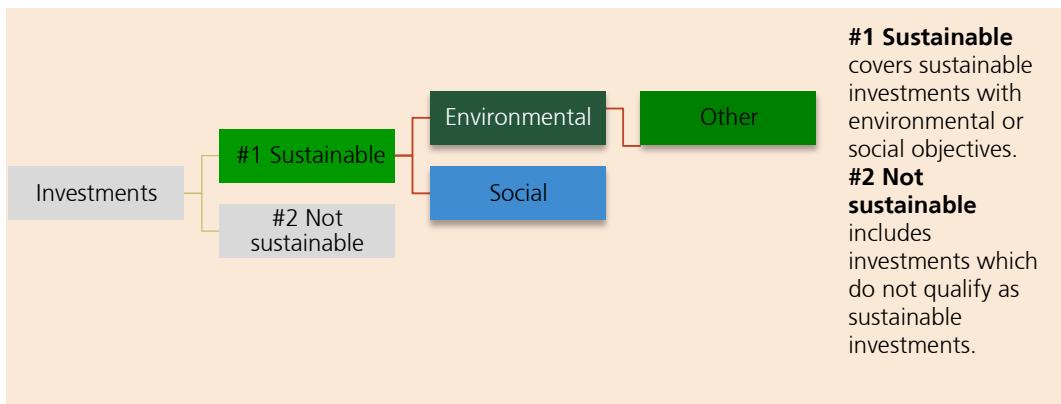
In order to ensure that companies that the Fund invests in follow good governance practices, as reasonably determined by the

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, compensation policy, 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 sustainable investments (#1 Sustainable) which combines the allocation to assets with social objectives and assets with environmental objectives. Within the category "Environmental" up to 100% will be committed to sustainable investments which are not aligned with the EU Taxonomy ("Other").

The below graphical representation contextualises the types of investment considered.



The Fund does not use derivatives specifically for the purpose of attaining the sustainable investment objective. 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 sustainable investment objective.

## (f) Monitoring of sustainable investments

The Asset Manager has in place internal control and governance mechanisms to measure and monitor the sustainable investments of the Fund on an ongoing basis. Such measuring and monitoring includes regular reporting of ESG key parameters and current positioning of the Fund. 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.

Whether the Fund attains its sustainable investment objective is based on an assessment of whether the Fund has successfully and consistently applied and executed the sustainability indicators as described in section (g) "Methodologies".

Reporting in terms of the monitoring of sustainable investments will take place as part of the SFDR periodic reporting. ESG parameters may also be considered by the Fund's auditor in the annual financial audits on the Fund.

## (g) Methodologies

The following sustainability indicators are assessed at the time of the initial investment and during the entire life of the investment thereafter:

- **ESG Exclusion Policy.** The first factor contributing to whether the Fund is attaining its sustainable investment objective will be an assessment of whether the Fund has successfully and consistently executed its ESG exclusion policy. 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*).
- **Screening based on ESG Rating.** Another factor contributing to whether the Fund will be considered to be attaining

its sustainable investment objective 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 and in the investment monitoring process.

The ESG rating is utilised to remove the lowest scoring companies available through the ESG cockpit. The application of the ESG rating screening process is applied to the total universe of companies analysed through the Asset Manager's proprietary rating tool and the lowest scoring 25% of companies analysed, in terms of their ESG score, are excluded from investment consideration. It should be noted that the range of companies 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%.

The following are key performance indicators on ESG factors related to an issuer that are included in the ESG cockpit in the process to reduce the universe of investable issuers through a systematic process which relies on information from underlying 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.*
- **Sustainable Investments.** The aggregate weight of all sustainable investments held by the Fund shall be calculated and used to measure the attainment by the Fund of the sustainable objective. 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 75% 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. Other than cash, cash equivalents and certain financial derivative instruments retained specifically for liquidity management and/or hedging purposes, the Fund will only invest in assets that are sustainable investments. Thus, another factor contributing to whether the Fund is attaining its sustainable investment objective 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 only instruments which either:
  - qualify as a Green, Social or Sustainable UOP instrument according to the principles of the International Capital Markets Associations ("ICMA") and contribute to specific UN SDGs, or
  - have a positive net contribution to UN SDGs by virtue of the issuer's net positive 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 companies within the investment universe with more attractive ESG values are scored more highly than others. Companies 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 an 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 Manager 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 sustainable investment objective 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 sustainable investment objective (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.

## (I) Designated reference benchmark

The Fund uses the Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index (the "**Performance Benchmark**") for performance measurement purposes only.

The Performance Benchmark is a mainstream index and does not take account of ESG factors and is therefore not consistent with the sustainable investment objective of the Fund. The methodology of the Performance Benchmark can be found here: [www.bloomberg.com/professional/product/indices/](http://www.bloomberg.com/professional/product/indices/).

The Fund does not restrict its investment universe to components of the Performance Benchmark or seek to track or replicate its performance. Accordingly, the Fund has not designated a specific index as a reference benchmark to determine whether it meets the sustainable investment objective.

Please refer to section of the Fund Supplement titled "Investment Strategy" for further information.

## Annex

### (a) Zusammenfassung

Es wird davon ausgegangen, dass der Fonds die Kriterien in Artikel 9 der Offenlegungsverordnung erfüllt, um als ESG-fokussierter 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-fokussierter Fonds nicht erfüllt, werden die Fondsergänzung, die Teil des Prospekts ist (die „**Fondsergänzung**“), und diese Website-Produktangaben entsprechend aktualisiert.

Der Fonds zielt darauf ab, in Emittenten zu investieren, die positiv zu den Zielen der Vereinten Nationen („**UN**“) für nachhaltige Entwicklung („**UN-SDGs**“) beitragen, und verfolgt damit ein nachhaltiges Investitionsziel, das darin besteht, durch eine Kombination aus Umweltzielen (z. B. Klimaschutz und Vermeidung und Kontrolle von Umweltverschmutzung) und sozialen Zielen einen positiven Beitrag zu den UN-SDGs zu leisten. Zur Erreichung seines Investitionsziels investiert der Fonds (direkt oder indirekt) vornehmlich in festverzinsliche Wertpapiere und in geringerem Umfang in andere Wertpapiere.

Bei der Auswahl der Investitionen für den Fonds führt der Asset Manager (a) eine Analyse des Anlageuniversums in Bezug auf Umwelt, Soziales und Unternehmensführung („**ESG**“) durch, um das nachhaltige Investitionsziel des Fonds zu erreichen, und (b) eine Fundamentalanalyse der Anlageklassen, Sektoren und Emittenten durch.

Mindestens 75 % der Vermögenswerte des Fonds werden nachhaltigen Investitionen zugeordnet, was die Allokation auf Vermögenswerte mit sozialen Zielen und Vermögenswerte mit Umweltzielen kombiniert. Damit ein Unternehmen, in das investiert wird, als nachhaltige Investition angesehen werden kann, muss es vom Asset Manager als die folgenden Kriterien erfüllend eingestuft werden: (i) es muss zu einem Umwelt- oder sozialen Ziel beitragen (was auf der Grundlage der Ausrichtung solcher Investitionen auf die UN SDGs, wie weiter unten betrachtet, beurteilt werden kann); (ii) es darf keine sonstigen Umwelt- oder sozialen Zielen erheblich beeinträchtigen; und (iii) es muss die Verfahrensweisen einer guten Unternehmensführung befolgen.

Ob der Fonds sein nachhaltiges Investitionsziel erreicht, basiert auf einer Beurteilung, ob der Fonds erfolgreich und konsequent (i) seine ESG-Ausschlussrichtlinie umgesetzt hat, (ii) sein ESG-Ratingsystem bei der Identifizierung eines Universums investierbarer Unternehmen und bei der Anlageüberwachung angewandt hat und ob er (iii) seine Politik bezüglich nachhaltiger Investitionen und UN SDGs angewandt hat.

Der Asset Manager misst und überwacht die Elemente, die erforderlich sind, um das Umweltziel des Fonds zu erreichen, mithilfe mehrerer externer ESG-Datenquellen und führt 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 des nachhaltigen Investitionsziels erheblich verändern oder beeinflussen. Darüber hinaus wendet der Asset Manager eine umfassende aktive Eigentümerpolitik für den Fonds an, die auch Interaktionen mit Emittenten durch Engagement umfasst.

Der Fonds verwendet den Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index (die „**Performance-Benchmark**“) nur zur Messung der Performance. Die Performance-Benchmark ist ein Mainstream-Index, der ESG-Faktoren nicht berücksichtigt und daher nicht mit dem nachhaltigen Investitionsziel des Fonds im Einklang steht. Dementsprechend hat der Fonds keinen bestimmten Index als Referenzwert festgelegt, um festzustellen, ob er das nachhaltige Investitionsziel erreicht.

### (a) Sammenfatning

Det vurderes, at fonden opfylder kriterierne i artikel 9 i SFDR og kvalificerer sig som en ESG-fokuseret fond. Dette kan til enhver tid revurderes. Hvis det på et senere tidspunkt vurderes, at fonden ikke opfylder kriterierne for at være en ESG-fokuseret fond, vil fondstilægget, der er en del af prospektet ("**fondstilægget**"), og disse produktoplysninger på webstedet blive opdateret i overensstemmelse dermed.

Fonden søger at investere i udstedere, der bidrager positivt til FN's verdensmål for bæredygtighed ("**FN's bæredygtighedsmaal**"), og den sigter således efter et bæredygtigt investeringsmål, der bidrager positivt til FN's bæredygtighedsmaal ved hjælp af en kombination af miljømæssige mål (f.eks. modvirkning af klimaændringer samt forebyggelse og bekämpelse af forurening) og sociale mål. Fonden søger at opnå investeringsmålet ved primært at investere (direkte eller indirekte) i fastforrentede værdipapirer og i mindre grad i andre værdipapirer.

Ved udvælgelse af investeringer til fonden vil formueforvalteren (a) udføre en miljømæssig, social og ledelsesmæssig analyse ("**ESG**") af investeringsuniverset med henblik på at opnå fondens bæredygtige investeringsmål og (b) udføre en grundlæggende analyse af aktivklasser, sektorer og udstedere.

Mindst 75 % af fondens aktiver vil være allokeret til bæredygtige investeringer, som kombinerer allokering til aktiver med sociale mål og aktiver med miljømæssige mål. For at en investeringsmodtagende enhed kan betragtes som en bæredygtig

investering, skal formueforvalteren vurdere, at den lever op til følgende kriterier: (i) Den skal bidrage til et miljømæssigt eller socialt mål (dette kan vurderes på baggrund af investeringernes overensstemmelse med FN's bæredygtighedsmål, som beskrives yderligere herunder); (ii) den må ikke gøre væsentlig skade på andre miljømæssige eller sociale mål; og (iii) den skal følge god ledelsespraksis.

Om fonden opnår sit bæredygtige investeringsmål vil være baseret på en vurdering af, om fonden succesfuldt og konsekvent har (i) eksekveret fondens ESG-udelukkelsespolitik, (ii) anvendt fondens ESG-vurderingssystem i forbindelse med at identificere et univers af investerbare virksomheder og i overvågningen af investeringer, samt om den har (iii) anvendt sin politik for bæredygtige investeringer og FN's bæredygtighedsmål.

Formueforvalteren mäter og överväger de elementer, der er påkrævet for at opnå fondens miljømæssige mål, ved hjælp af flere ESG-datakilder fra tredjeparter og udfører flere due diligence-trin for de enkelte investeringer.

Selvom formueforvalteren stræber efter at sikre robuste ESG-relaterede analyser, kan dataene have visse begrænsninger. Det forudsættes imidlertid ikke, at disse begrænsninger i væsentlig grad vil ændre opnåelsen af det bæredygtige investeringsmål. Derudover anvender formueforvalteren en omfattende politik om aktivt ejerskab på fonden, der inkluderer interaktion med udstedsere via direkte og indirekte engagement.

Fonden anvender Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index ("**resultatbenchmark**") udelukkende i resultatmålingsøjemed. Resultatbenchmarket er et generelt indeks, der ikke tager højde for ESG-faktorer, og som derfor ikke er i overensstemmelse med fondens bæredygtige investeringsmål. Derfor har fonden ikke angivet et specifikt indeks som referencebenchmark til at afgøre, hvorvidt den opnår sit bæredygtige investeringsmål.

## (a) Tiivistelmä

Rahaston katsotaan täytävän SFDR-asetuksen 9 artiklan kriteerit ESG-tekijöihin keskityville rahastoille. Tätä voidaan arvioida uudelleen milloin tahansa. Jos tulevaisuudessa todetaan, että rahasto ei täytä kriteerejä, joiden perusteella se voidaan laskea ESG-tekijöihin keskityväksi rahastoksi, rahastoesitteeseen ja näihin verkkosivustoilla annettaviin tuotetietoihin kuuluvaa rahastoa koskeva liittää ("**rahastoa koskeva liite**") päivitetään vastavasti.

Rahasto pyrkii sijoittamaan liikkeeseenlaskijoihin, jotka edistävät Yhdystyneiden kansakuntien ("YK") kestävän kehityksen tavoitteita ("SDG"). Siten rahasto noudattaa kestävää sijoitustavoitetta edistämällä YK:n kestävän kehityksen tavoitteita (SDG) ympäristötavoitteiden (kuten ilmastonmuutoksen lieventäminen sekä saasteiden estäminen ja hallinta) ja yhteiskunnallisten tavoitteiden yhdistelmällä. Rahasto pyrkii saavuttamaan sijoitustavoitteensa sijoittamalla (joko suoraan tai epäsuorasti) ensisijaisesti kiinteätuottoisiin arvopapereihin ja vähemmässä määrin muihin arvopapereihin.

Valittaessa rahaston sijoituksia varainhoitaja (a) suorittaa ympäristöön, yhteiskuntaan ja hallintotapaan ("ESG") liittyvän sijoitusuniversumin analysin rahaston kestävän sijoitustavoitteen saavuttamiseksi ja (b) analysoi omaisuusluokat, sektorit ja liikkeeseenlaskijat perusteellisesti.

Vähintään 75 prosenttia rahaston varoista allokoidaan kestäviin sijoituksiin, mikä käsittää varojen allokoinnin sekä yhteiskunnallisiin tavoitteisiin että ympäristötavoitteisiin. Jotta sijoituskohdetta voidaan pitää kestävänä sijoituksena, varainhoitajan on arvioitava se seuraavien kriteerien mukaisesti: (i) sen on edistettävä ympäristötavoitetta tai yhteiskunnallista tavoitetta (jotka voidaan arvioida sen perusteella, vastavatko ne YK:n kestävän kehityksen tavoitteita (SDG), kuten on jäljempänä kuvailtu); (ii) se ei saa aiheuttaa merkittävästi haittaa millekään muulle ympäristötavoitteelle tai yhteiskunnalliselle tavoitteelle; ja (iii) sen on noudatettava hyvä hallintotapaa.

Rahaston kestävän sijoitustavoitteen saavuttamista arvioidaan sen perusteella, miten rahasto on onnistunut yhdenmukaisesti (i) toteuttamaan ESG-poissulkemiskäytäntöä ja (ii) soveltanut sen ESG-arviointijärjestelmää sijoituskelpoisten yritysten sijoitusuniversumin määrittämisprosessissa ja sijoitusten seurantaprosessissa kuin myös sen perusteella, miten (iii) käytäntöä on toteutettu suhteessa kestäviin sijoituksiin ja YK:n kestävän kehityksen tavoitteisiin (SDG).

Varainhoitaja mittaa ja seuraa vaadittavia elementtejä käytämillä useita kolmannen osapuolen ESG-tietolähteitä rahaston ympäristötavoitteen saavuttamiseksi ja noudattaa monivaiheista asianmukaista huolellisuutta yksittäisten sijoitusten osalta.

Varainhoitaja pyrkii varmistamaan vankat ESG-analysit, mutta tietoja saattaa koskea tietyt rajoitukset. Nämä rajoitukset eivät kuitenkaan todennäköisesti merkittävästi vaikuta rahaston kestävän sijoitustavoitteen saavuttamiseen tai muuta sitä. Lisäksi varainhoitaja soveltaa rahastoon perusteellista aktiivisen omistajuuden käytäntöä, joka käsittää suoran ja epäsuoran yhteydenpidon liikkeeseenlaskijoihin.

Rahasto käyttää Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index -indeksiä ("**tuotto- tai arvonkehityksen vertailuarvo**") vain tuotto- tai arvonkehityksen mittaamiseen. Rahaston käyttämä tuotto- tai arvonkehityksen vertailuarvo on yleisindeksi, jossa ei oteta huomioon ESG-tekijöitä, eikä se siksi ole yhdenmukainen rahaston kestävän sijoitustavoitteen kanssa. Rahastolle ei ole määritetty tiettyä vertailuarvoa, jotta voitaisiin määrittää, saavuttaako rahasto kestävän sijoitustavoitteensa.

## (a) Samantekt

Talið er að sjóðurinn uppfylli skilyrðin í 9. grein SFDR til að uppfylla skilyrði sem ESG-miðaður sjóður. Hægt er að endurmetsa þetta hvenær sem er. Ef það verður ákveðið á einhverjum tímapunkti í framtíðinni að sjóðurinn uppfylli ekki skilyrðin til að uppfylla forsendur sem ESG-miðaður sjóður, skal sjóðsviðauki, sem er hluti af útboðslýsingu („**sjóðsviðbót**“), og þessa vörupplýsingu á vefsíðu uppfærð. Í samræmi við það.

Sjóðurinn miðar að því að fjárfesta í útgefendum sem leggja til á jákvæðann hátt í sjálfbærri þróunarmarkmið Sameinuðu þjóðanna („**SDG SP**“) og elta þannig sjálfbær fjárfestingarmarkmið um að leggja jákvætt af mörkum til SP með samsetningu umhverfismarkmiða (svo sem mildun loftslagsbreyttinga og mengunarvarnir og varnir) og félagsleg markmið. Sjóðurinn mun leitast við að ná fjárfestingarmarkmiði sínu með því að fjárfesta (annaðhvort beint eða óbeint) fyrst og fremst í verðbréfum með fóstum tekjum og í minna mæli í öðrum verðbréfum.

Við val á fjárfestingum fyrir sjóðinn framkvæmir eignastjórinn (a) umhverfis-, félags- og stjórnarhætti („**ESG**“) greiningu á fjárfestingarheiminum til að ná sjálfbærum fjárfestingarmarkmiðum sjóðsins og (b) framkvæmir grundvallargreiningu á eignaflokkum, geirum og útgefendum.

Að minnsta kosti 75% af eignum sjóðsins verður ráðstafað til sjálfbærra fjárfestinga sem sameinar úthlutun til eigna með félagsleg- og umhverfismarkmið. Til þess að eining, sem fjárfest er í, teljist sjálfbær fjárfesting, verður hún að vera metin af eignastjóranum til að uppfylla eftifarandi skilyrði: (i) verður að stuðla að umhverfislegu eða félagslegu markmiði (sem má meta á grundvelli samræmis slíkra fjárfestinga við SDG SP, eins og nánar er skoðað hér að neðan); (ii) má ekki skaða nein önnur umhverfis- eða félagsleg markmið; og (iii) verður að fylgja góðum stjórnarháttum.

Hvort sjóðurinn sé að ná sjálfbærum fjárfestingarmarkmiðum sínum mun byggjast á mati á því hvort sjóðurinn hafi með góðum árangri og stöðugt (i) framfylgt ESG útilokunarstefnu sinni (ii) beitt sínu ESG matskerfi í ferlinu til að bera kennsl á alheim fyrirtækja sem hægt er að fjárfesta í og í fjárfestingareftirlitsferlinu, sem og hvort það (iii) beitti stefnu sinni varðandi sjálfbærar fjárfestingar og SDG SP.

Eignastjórinn mælir og fylgist með þeim þáttum sem nauðsynlegir eru til að ná umhverfismarkmiðum sjóðsins með því að nota margar ESG-gagnaheimildir þriðja aðila og framkvæmir nokkur skref áreiðanleikakönnunar á einstökum fjárfestingum.

Þó að eignastjórinn kappkosti að tryggja styrkleika ESG-tengdra greininga sinna, kunna að vera ákveðnar takmarkanir á gögnum. Hins vegar er ekki fyrirséð að þessar takmarkanir breyti verulega eða hafi áhrif á að markmið sjálfbærrar fjárfestingar verði náð. Að auki beitir eignastjórinn yfirgrípsmikilli virkri eigendastefnu gagnvart sjóðnum, sem felur í sér samskipti við útgefendor með beinni og óbeinni þátttöku.

Sjóðurinn notar Bloomberg Global Aggregate Corporate 1–5 Years ex banking ex tobacco Index („**árangursviðmið**“) eingöngu til árangursmælinga. Árangursviðmiðið er almenn vísalta og tekur ekki tillit til ESG þáttu og er því ekki í samræmi við sjálfbæra fjárfestingarmarkmið sjóðsins. Samkvæmt því hefur sjóðurinn ekki tilnefnt tiltekna vísitölu sem viðmiðunarviðmið til að ákvarða hvort hún standist sjálfbæra fjárfestingarmarkmiðið.

## (a) Sammendrag

Det anses at fondet oppfyller kriteriene i artikkel 9 i SFDR for å være kvalifisert som et ESG-fokusert fond. Dette kan når som helst revurderes. Hvis det på et fremtidig tidspunkt fastslås at fondet ikke oppfyller kriteriene som et ESG-fokusert fond, skal fondstillegget, som utgjør en del av prospektet («**fondstillegget**») og denne produktinformasjonen på nettstedet oppdateres tilsvarende.

Fondet tar sikte på å investere i utstedere som positivt bidrar til FNs («**FN**») bærekraftsmål («**FNs bærekraftsmål**»), og arbeider dermed mot et bærekraftig investeringsmål om å bidra positivt til FNs bærekraftsmål gjennom en kombinasjon av miljømessige mål (som f.eks. begrensning av klimaendringer og forebygging og kontroll av forurensning) og sosiale mål. Fondet vil søke å oppnå sitt investeringsmål ved å investere (enten direkte eller indirekte) primært i rentepapirer og i mindre grad i andre verdipapirer.

Ved utvelgelse av investeringer for fondet foretar kapitalforvalteren (a) en analyse av miljømessige, sosiale og styringsmessige forhold («**ESG**») i investeringsuniverset med sikte på å oppnå fondets bærekraftige investeringsmål og (b) en grunnleggende analyse av aktivaklasser, sektorer og utstedere.

Minst 75 % av fondets aktiva vil bli allokeret til bærekraftige investeringer som kombinerer allokeringen til aktiva med sosiale mål og aktiva med miljømål. For at et investeringsmål skal anses som en bærekraftig investering, må den etter kapitalforvalterens vurdering oppfylle følgende kriterier: (i) den må bidra til et miljømessig eller sosialt mål (som kan vurderes på grunnlag av tilpasningen av slike investeringer til FNs bærekraftsmål, som vurdert videre nedenfor); (ii) den må ikke være til betydelig skade for noen annen miljømessig eller sosial målsetting; og (iii) den må følge god styringspraksis.

Hvorvidt fondet oppnår sitt investeringsmål, vil være basert på en vurdering av hvorvidt fondet på en vellykket og konsekvent måte har (i) utført sine retningslinjer for ESG-utelukkelse for fondet, (ii) anvendt ESG-ratingsystemet i prosessen for fondet for å identifisere et univers av selskaper som kan investeres og i investeringsovervåkingsprosessen, samt om (iii) investeringsforvalteren har anvendt sine retningslinjer for fondet knyttet til bærekraftige investeringer og FNs bærekraftsmål.

Kapitalforvalteren mäter og overvåker elementene som kreves for å nå fondets miljømål ved bruk av flere ESG-datakilder fra tredjeparter og utfører flere trinn med akt somhetsvurderinger for de enkelte investeringene.

Selv om kapitalforvalteren streber etter å oppnå robuste ESG-relaterte analyser, kan det være visse begrensninger i dataene. Det forventes imidlertid ikke at disse begrensningene i vesentlig grad endrer eller påvirker oppnåelsen av det bærekraftige investeringsmålet. I tillegg anvender kapitalforvalteren omfattende retningslinjer for aktivt eierskap for fondet. Dette omfatter samhandling med utstedere gjennom direkte og indirekte engasjement.

Fondet benytter Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco-indeksen («**referanseindeksen**») kun til måling av verdiutvikling. Referanseindeksen er en vanlig indeks og tar ikke hensyn til ESG-faktorer og er derfor ikke i samsvar med fondets bærekraftige investeringsmål. Følgelig har ikke fondet utpekt en spesifikk indeks som en referanseindeks for å avgjøre om den oppfyller det bærekraftige investeringsmålet.

## (a) Sammanfattning

Fonden anses uppfylla kriterierna i artikel 9 i SFDR för att kvalificera sig som en ESG-fokuserad fond. Detta kan omprövas när som helst. Om det vid en framtida tidpunkt fastställs att fonden inte uppfyller kriterierna för att kvalificera sig som en ESG-fokuserad fond, ska fondbilagan, som utgör en del av prospektet ("**fondbilagan**") och produktupplysningarna på denna webbplats uppdateras därefter.

Fonden strävar efter att investera i emittenter som positivt bidrar till Förenta Nationernas ("**FN**") globala mål för hållbar utveckling och har därför ett mål för hållbara investeringar för att positivt bidra till FN:s globala mål för hållbar utveckling genom en kombination av miljömål (till exempel reducering av klimatförändringar och förebyggande och kontroll av föroreningar) och sociala mål. Fondens strävan efter att uppnå sitt investeringsmål genom att främst investera (direkt eller indirekt) i räntebärande värdepapper och i mindre utsträckning i andra värdepapper.

Vid val av investeringar för fonden utför kapitalförvaltaren a) en analys av miljö, sociala frågor och bolagsstyrning ("**ESG**") för investeringsområdet för att uppnå fondens mål för hållbara investeringar och b) utför en fundamental analys av tillgångsklasser, sektorer och emittenter.

Minst 75 % av fondens tillgångar kommer att allokeras till hållbara investeringar som kombinerar tillgångar med sociala mål och tillgångar med miljömål. För att ett företag som investeras i ska anses vara en hållbar investering måste det av kapitalförvaltaren bedömas följa dessa kriterier: i) den måste bidra till ett miljömässigt eller socialt mål (som kan bedömas utifrån sådana investeringars förenlighet med FN:s globala mål för hållbar utveckling, enligt vad som anses nedan), ii) den får inte orsaka någon betydande skada för något annat miljömål eller socialt mål, och iii) den måste följa god praxis för bolagsstyrning.

Huruvida fonden uppnår målet för hållbara investeringar fastställs på grundval av en bedömning om fonden framgångsrikt och konsekvent i) har genomfört ESG-uteslutningspolicy, ii) tillämpat ESG-klassificeringssystemet under processen för att identifiera ett område bestående av investeringsbara företag och under processen för investeringsuppföljning, samt om investeringsförvaltaren iii) har tillämpat policy för hållbara investeringar och FN:s globala mål för hållbar utveckling.

Kapitalförvaltaren mäter och övervakar de element som krävs för att uppnå fondens miljömål med hjälp av flera ESG-datakällor från tredje part och utför flera steg för "due diligence" på de enskilda investeringarna.

Även om kapitalförvaltaren strävar efter att säkerställa robustheten i sina ESG-relaterade analyser, kan det finnas vissa begränsningar i datan. Det är dock inte väntat att dessa begränsningar väsentligt ändrar eller påverkar uppnåendet av målet för hållbara investeringar. Dessutom tillämpar kapitalförvaltaren en omfattande aktiv ägarpolicy för fonden, vilket inkluderar interaktioner med emittenter genom direkt och indirekt engagemang.

Fonden använder Bloomberg Global Aggregate Corporate 1-5 Years ex banking ex tobacco Index ("**resultatatrikvärde**") endast i resultatmätningssyfte. Resultatatrikvärdet är ett mainstream-index och tar inte hänsyn till ESG-faktorer, och är därför inte förenligt med fondens mål för hållbara investeringar. Därför har fonden inte utsett ett särskilt index som referensvärde för att bestämma om den överensstämmer med målet för hållbara investeringar.