

# **SOLYS**

# **CARMIGNAC EQUITY SELECTION**

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Article 10 (SFDR)

Website disclosure for an Article 8 fund

**SG29 Haussmann**

**June 2023**

This document includes information relating to environmental and social characteristics of financial products, and sustainable investments, in accordance with article 10 of the Sustainable Finance Disclosure Regulation (SFDR)<sup>1</sup>.

<b>PRODUCT NAME: SOLYS CARMIGNAC EQUITY SELECTION</b> Legal entity identifier: 549300GRMZMNMWQRAC84	
<b>Does this financial product have a sustainable investment objective?</b>	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, <b>it will have a minimum proportion of 10% of sustainable investments</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

<sup>1</sup> 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.



## A. SUMMARY

The Sub-Fund SOLYS – Carmignac Equity Selection (the “Sub-Fund”) is an active UCITS. The Investment objective of the Sub-Fund is to outperform the Benchmark Index (as defined hereafter) over a long-term horizon by exploiting investment opportunities on the equity markets, while providing a fixed stream of distributions. The Sub-Fund seeks to achieve its objective by investing in:

- a diversified basket of transferable securities (the "Basket"), including mainly fixed or variable debt instruments issued or guaranteed by sovereign states of the Euro Zone with a rating at least equal to that of France and shares or units of UCITS or other UCIs,

and, or,

- in an OTC Derivative (the "Swap") the purpose of which is to reach its investment objective by exchanging the investment proceeds against the value of the Portfolio (as defined hereafter). The Sub-Fund promotes environmental or social characteristics but will not make any sustainable investments. At least 90% of the Sub-Fund investments promote environmental and social characteristics. The Sub-Fund will do at least 10% of the sustainable investments within the meaning of SFDR. These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the product’s underlying investments which take into account the EU criteria for environmentally sustainable economic activities.

To identify the positive contribution to an environmental and/or social objective, the Investment Manager implements the framework of the Sustainable Development Goals (SDGs) adopted by the United Nations in 2015 with a target date for delivery of 2030 and the European Taxonomy.

In order that investment would be considered as sustainable, it must be aligned to at least one SDG without being misaligned to any other SDG, while respecting all the principles of Investment manager’s ESG policy.

The Sub-Fund promotes environmental and social characteristics through its integration of extra-financial criteria in the investment process and by exclusions of certain sectors or activities, that do not respect certain norms or values. The environmental and/or social characteristics promoted by the Sub-Fund are based on an approach combining fundamental financial analysis and extra-financial analysis through the consideration of ESG criteria (Environment, Social, Governance).

The Investment Manager addresses ESG factors throughout the investment process, including research, company engagement and portfolio construction. The Investment Manager incorporates i) an exclusion policy completed by ii) an ESG Integration policy.

Depending on the sector of activity and geographical presence, every issuer is exposed to different material extra-financial risks. Our key ESG analysis looks at the capacity of management of the issuer to manage its principal material risks and opportunities arising from environmental issues (such as carbon emissions, water stress), social aspects (such as work safety, staff rotation), or governance practices (board and accounting). For the purpose of evaluation of ESG risk management of issuers, the Sub-Fund uses data provider MSCI and its ESG ratings. The Sub-Fund does not invest in the issuers evaluated as laggards, with the ratings CCC. And in addition, the issuers that were part of the 20% worst ESG-scores were excluded.

No reference benchmark has been designated for the purpose of attaining the environmental and/or social characteristics promoted by the sub-fund.



## B. NO SUSTAINABLE INVESTMENT OBJECTIVE

This sub-fund promotes environmental or social characteristics but will not make any sustainable investments.

### How does this financial product take into account principal adverse impacts<sup>2</sup> on sustainability factors?

The PAIs are taken into account throughout the investment process: through the exclusion policy (sectoral and normative), the ESG integration policy and performance indicators (ESG ratings, ESG controversies score).

The Sub-Fund considers the PAIs detailed in the table below.

	PAI	Measurement criteria	Engage-ment	Exclu-sion	Comment
1	Greenhouse Gas Emissions	Scope 1 GHG emissions	X	X	- Thermal Coal Sector Policy - Unconventional oil & gaz sector policy - Net Zero Asset Managers Signatory
		Scope 2 GHG emissions	X	X	
		Scope 3 GHG emissions	X	X	
		Total GHG emissions			
2	Carbon footprint	Carbon footprint	X	X	
3	GHG intensity of investee companies	GHG intensity of investee companies	X	X	
4	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	X	X	
5	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources			
6	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector			
7	Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	X	X	- Deforestation exclusion policy; Palm oil exclusion policy

<sup>2</sup> 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, anticorruption and antibribery matters.

8	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average			
9	Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average			
10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises		X	- Controversies exclusion filter
11	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises			
12	Unadjusted gender pay gap	Average unadjusted gender pays gap of investee companies			
13	Board gender diversity	Average ratio of female to male board members in investee companies			
14	Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons		X	- Exclusions related to controversial arms

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

In accordance with the Société Générale Group's "Defence" sector policy, which meets the obligations of the Ottawa (1999) and Oslo (2008) conventions applicable to all French management companies, companies involved in activities related to prohibited or controversial weapons (anti-personnel mines, cluster bombs, depleted uranium weapons) are excluded from the Sub-Fund's investment universe.

In addition, and in accordance with the Management Company's investment policy, companies with a very severe controversy rating (red) according to the MSCI nomenclature are excluded from the investment universe. These exclusions guarantee full compliance with the OECD guidelines for multinational enterprises and the United Nations guidelines on business and human rights.

The Controversy Rating is notably a warning measure of the reputational and operational risks to which companies are exposed. A very serious controversy can potentially result in heavy financial penalties. All of these indicators are monitored periodically.



## C. ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

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

The Sub-Fund promotes environmental and social characteristics through its integration of extra-financial criteria in the investment process and by exclusions of certain sectors or activities, that do not respect certain norms or values.

The environmental and/or social characteristics promoted by the Sub-Fund are based on an approach combining fundamental financial analysis and extra-financial analysis through the consideration of ESG criteria (Environment, Social, Governance).

The Investment Manager addresses ESG factors throughout the investment process, including research, company engagement and portfolio construction. The Investment Manager incorporates i) an exclusion policy completed by ii) an ESG Integration policy.

Depending on the sector of activity and geographical presence, every issuer is exposed to different material extra-financial risks. Our key ESG analysis looks at the capacity of management of the issuer to manage its principal material risks and opportunities arising from environmental issues (such as carbon emissions, water stress), social aspects (such as work safety, staff rotation), or governance practices (board and accounting). For the purpose of evaluation of ESG risk management of issuers, the Sub-Fund uses data provider MSCI and its ESG ratings. The Sub-Fund did not invest in the issuers evaluated as laggards, with the ratings CCC. And in addition, the issuers that were part of the 20% worst ESG-scores were excluded.

No reference benchmark has been designated for the purpose of attaining the environmental and/or social characteristics promoted by the sub-fund.

### **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

N/A

### **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?**

N/A



## D. INVESTMENT STRATEGY

### **What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?**

Equities composing the Portfolio will be based on three regional buckets (US, EU and JP) and equities composing each bucket will be selected by a proprietary methodology designed by the Management Company (the "Methodology") which relies on a financial analysis combined with a non-financial analysis that ranks the instruments of the Investment Universe based on a combination of ESG (Environmental, Social, Governance) criteria.

Within the investment universe, equities composing the Sub-Fund's portfolio (the "Portfolio") will be selected according to the Investment Manager's ESG rating, based on a best-in-universe approach. In order to do so, equities of the Investment Universe will be ranked using the Investment Manager's rating methodology which consists in assessing ESG risks and opportunities as recorded in the Investment Manager's proprietary ESG platform "START" (System for Tracking and Analysis of a Responsible Trajectory). Negative screening:

1. The Investment Universe is screened to exclude binding Energy- and Ethical-related exclusions.

Companies with high ESG risks which are reflected through their respective ESG ratings are also excluded.

2. Both the START ESG rating and MSCI ESG rating scores are used in this screening:

- companies having an overall MSCI rating of "CCC" are excluded from the Sub-Fund's Investment Universe;
- companies having an overall MSCI rating of B or BB are also excluded, unless the company's business activities are aligned to one of the 9 United Nations Sustainable Development Goals ("UN SDGs") selected by the Investment Manager.

A company is considered 'aligned' when over 50% of their revenues come from, or over 50% of their CapEx are invested in, activities which are deemed to contribute to one of the following nine (out of 17) UN SDGs : (1) No Poverty, (2) No Hunger, (3) Good Health and Well Being, (4) Quality Education, (6) Clean Water, (7) Affordable and Clean Energy, (9) Industry, Innovation and Infrastructure, (11) Sustainable Cities and Communities (12) Responsible Consumption and Production.

3. Furthermore, the Sub-Fund applies company-wide and norms-based screening to exclude certain sectors and companies.

The methodology will retain the equities with the highest ESG rating, by excluding at least 20% of the equities comprising the Investment Universe with the lowest ESG rating. The reduction of the sub-fund's Investment Universe based on the negative screening is updated on a quarterly basis

For details, please refer to exclusion policy available on the Investment Manager's Responsible Investment website: [www.carmignac.fr/fr\\_FR/responsible-investment/politiques-et-rapports-d-investissement-responsable-4738](http://www.carmignac.fr/fr_FR/responsible-investment/politiques-et-rapports-d-investissement-responsable-4738).

Using equities selected through this ESG screening process, and a financial analysis applied by the Investment Manager, the Portfolio will be predominantly weighted by the Investment Manager in accordance with an equal-risk contribution methodology.

The Management Company retains discretion to deviate from such methodology on an exceptional basis. Environmental and/or social characteristics promoted by the Sub-Fund are met through the selection of equities based on the ESG screening process (as described above).

The Portfolio will be rebalanced in compliance with the ESG methodology on a monthly basis. However, the Investment Manager may decide to rebalance the Portfolio at any other time at its discretion (the "Rebalancing Date").

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product are:

Equity investment universe is actively reduced by at least 20%,  
ESG analysis is applied to at least 90% of companies of the equity portfolio to which the Sub-Fund has variable economic exposure.

The Sub-Fund acts in accordance with the United Nations Global Compact (UNGC) principles, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises to assess companies' norms, including but not limited to human rights abuses, labour laws and standard climate related practices.

This Sub-Fund applies a controversy screening process for all the equities composing the Portfolio. This process has for objective the exclusion from its investment universe of companies that have committed significant controversies against the environment, human rights and international labour laws to name a few. This screening process bases its controversy identification on the OECD Business Guidelines and UN Global compact principles and is commonly called Norms-based screening, integrating a strict flagging system monitored and measured through a proprietary ESG system. A company controversy scoring and research is applied using data extracted from ISS-ESG as the research data base.

In addition, the following exclusions are applied:

The Societe Generale Group's "thermal coal" sector policy excludes from the investment universe companies whose turnover is more than 10% linked to the extraction of thermal coal as well as companies active in the energy sector. and of which more than 30% of the electricity production comes from coal.

In accordance with the Societe Generale Group's "tobacco" sector policy, tobacco-producing companies are excluded from the investment universe.

The Investment Manager excludes from the investment universe producers and distributors (i.e. mills, traders and refiners) of palm oil from the first euro of turnover on this activity, with the exception palm oil producers certified by the Roundtable on Sustainable Palm Oil, RSPO (Roundtable Sustainable Palm Oil) with a minimum certification level of 70% and with a commitment to be 100% by 2030.

The Societe Generale Group's "unconventional oil and gas" sector policy, the Investment Manager excludes from the investment universe companies whose turnover is more than 10% related to exploration and the production of oil sands, oil or gas produced in the Arctic, or shale oil or gas.

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

N/A



**Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)?**

Yes

No

The Investment Manager incorporates an exclusion policy completed by an ESG Integration policy. This two-fold SRI approach will lead to exclude at least 20% of the initial investment universe.

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

Yes

No

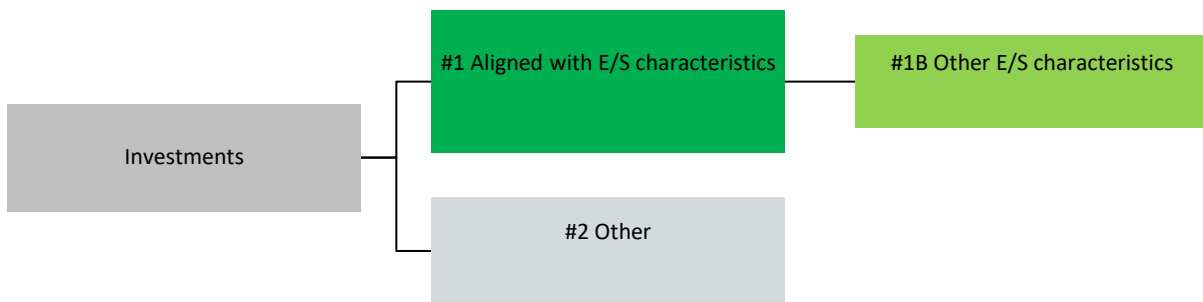
**E. PROPORTION OF INVESTMENTS**

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

The sub-fund has a variable economic exposure (via derivatives) to an equity portfolio and, 90% the equities composing the portfolio are ESG scored (“#1 Aligned with E/S characteristics”). As the sub-fund is synthetic, in case of swap counterparty default the sub-fund is exposed to government bonds as collateral.

Consequently, as a result of such variable exposure, at least 50% of the Fund’s net assets are subject to an ESG analysis or rating by the Management company, under normal market circumstances.

The “#2 other” assets may consist of investments in liquidity, capital instruments or debt, derivatives and collective investment undertakings that do not promote environmental or social characteristics and that are used to achieve the financial objective of the sub-fund and/or for diversification and/or hedging purposes.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (Including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)?**

N/A

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

N/A

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

N/A

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

The “#2 Other” assets may consist of investments in liquidity, capital instruments or debt, derivatives and collective investment undertakings that do not promote environmental or social characteristics and that are used to achieve the financial objective of the sub-fund and/or for diversification and/or hedging purposes. No minimum environmental or social safeguards will be in place in relation to such assets.



## F. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

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

The Sub-Fund promotes environmental and social characteristics through its integration of extra-financial criteria in the investment process and by exclusions of certain sectors or activities, that do not respect certain norms or values.

- **ESG rating:** The Methodology will retain the equities with the highest ESG rating, by excluding at least 20% of the equities comprising the Investment Universe with the lowest ESG rating. More than 90% of the equities composing the Portfolio do benefit from an ESG rating.
- **Very Severe Controversy:** The Sub-Fund promotes the respect of certain norms and values, by excluding companies with very severe level of social or environmental controversies or involved in controversial weapons
- **Controversial Activities:** For some other controversial activities, such as tobacco, coal or defense, the Sub-Fund applies maximum revenue percentage thresholds.
- **Concerns about respect of Human Rights:** social aspects (such as work safety, staff rotation), or governance practices (board and accounting).

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

**Monitoring by SG29H risk management**

The risk department of the management company monitors the overall financial and non-financial parameters of the portfolio.

The non-financial part (ESG) is monitored on a monthly basis:

- Check that no controversy Red Flag is present in the portfolio
- Check that no MSCI CCC and B ratings is present in the portfolio
- Activity and Sector exclusions check.

If the position does not pass one of these controls, the risk department alerts the portfolio management team, which processes to the divestment process as described below. The Portfolio management team will also take into consideration the liquidity of the issue and the market conditions.



**G. METHODOLOGIES**

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

All the binding elements and sustainability indicators are measured on a monthly basis by SG29H risk management team. If the values are in line with the objectives (indicators at 0% or above pre-defined thresholds), the environmental and social characteristics promoted of the sub-fund will be considered as attained.



**H. DATA SOURCES AND PROCESSING**

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

The management company has established a number of partnerships to access non-financial research:

- The Sub-Fund's ESG analysis relies on external data providers (MSCI, Bloomberg)
- Services of a proxy voting advisor (ISS) for research on company governance (as part of SG29H's Engagement and Voting Policy).
- SG29H uses the Carbon database provided by MSCI.

The management team also has multiple sources of external ESG information (brokers' extra-financial research).



## I. LIMITATIONS TO METHODOLOGIES AND DATA

### **What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)**

The investment process is based on qualitative and quantitative research based solely on the raw data published by companies. Thus, a first limit consists in the reliability of the published data based on credibility and the audit of non-financial reports of companies.

In addition, the Sub-Fund's ESG methodology is a proprietary and transparent methodology but is not based on any international standards. For this reason, maximum transparency on all the indicators used in the calculations is mandatory and an integral part of the management process. As regards the monitoring of controversies, it remains an evaluation exercise in which the best means are put in place to exclude from management companies that are controversial or at risk of controversy. Nevertheless, a limit lies in the impossibility of preventing all controversies and thus displaying a zero risk on this point.



## J. DUE DILIGENCE

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

The risk department of the management company monitors the overall financial and non-financial parameters of the portfolio.

The non-financial part (ESG) is monitored monthly:

- Check that no controversy Red Flag is present in the portfolio
- Check that no MSCI CCC and B ratings is present in the portfolio
- Activity and Sector exclusions check.

If the position does not pass one of these controls, the risk department alerts the portfolio management team, which processes to the divestment process as described below. The Portfolio management team will also take into consideration the liquidity of the issue and the market conditions.



## K. ENGAGEMENT POLICIES

### **Is engagement part of the environmental or social investment strategy?**

- Yes  
 No

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

N/A



## L. REFERENCE BENCHMARK

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

Yes

No

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