

SOLYS - AB GLOBAL DEVELOPED HEALTH CARE

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

SG29 Haussmann April 2024



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)¹.

| PRODUCT NAME: SOLYS AB GLOBAL DEVELOPED HEALTH CARE Legal entity identifier: 636700HIJ6ODR6ZXZG74 | | | | | | |
|---|--|--|--|--|--|--|
| Does this financial product have a sustainable investment objective? | | | | | | |
| □Yes | ⊠ No | | | | | |
| ☐ It will make a minimum of sustainable investments with an environmental objective:% ☐ in economic activities that qualify as environmentally sustainable under the EU | characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments | | | | | |
| Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | □ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy | | | | | |
| | □ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | | | | | |
| ☐ It will make a minimum of sustainable investments with a social objective:% | ⋈ with a social objective □ It promotes E/S characteristics, but will not make any sustainable investments | | | | | |

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¹ 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.





The Sub-Fund SOLYS – AB GLOBAL DEVELOPED HEALTH CARE (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, and it will have a minimum proportion of 5% of sustainable investments with a social objective.

How does this financial product take into account principal adverse impacts² 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.

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

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² 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 | х | - 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 | Х | - 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. In addition, the Sub-Fund promotes an ESG integration approach as part of the promotion of environmental and social characteristics.

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?

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

The 17 SDGs aim to foster collaboration within private and public entities to address the global challenges such as poverty, climate change, inequality, or peace and justice. In order to identify the contribution, positive or negative, to a SDG, the issuer is assessed in terms of his operational and product alignment towards each of the 17 SDGs. Every company may contribute to the goals in a variety of ways (positively and negatively) and across several goals.



To this end, MSCI was selected as the reference data provider to measure the alignment of companies with the SDGs. To identify the contribution to an SDG, MSCI assesses the company's alignment based on the positive or negative impact of its products and services on the achievement of the SDGs as well as on the company's operational policies.

The product alignment assesses the net impact of issuer's products or services to achieve a specific SDG. The operational alignment assesses the extent to which an issuer addresses a specific SDG via its internal policies and practices, targets, performance metrics.

Each investment can be considered as sustainable or not sustainable (pass/fail approach). 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 our sectoral and norm-based exclusions.

In addition, the Management Company takes into account the alignment of companies with the first 2 environmental objectives of the European Taxonomy (Mitigation of climate change and adaptation to climate change).

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?

The DNSH principle is taken into account through several filters. Such filters are described below and are used to exclude investments that are considered not sustainable due to their failure to meet minimum standards.

- Very severe controversies ('red flag' controversies),
- Norm-based exclusions and,
- Monitoring of adverse impacts



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?

The Investment Manager uses fundamental and quantitative research to select securities that it believes offer superior long-term growth characteristics within the Healthcare sector. This is supported by a proprietary methodology designed by the Investment Manager (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.

Among equities composing the Portfolio, some are denominated in foreign currencies (i.e., not denominated in euros) and, the exposure of the Sub-Fund to each foreign-currency denominated equities will be hedged against the Euro.

Within the Investment Universe, equities comprising the Portfolio will be selected according to their ESG scoring, based on a best-in-class approach. In order to do so, equities of the Investment Universe will be ranked using proprietary ESG materiality weightings and a combination of fundamental ESG scores and third-party ESG management assessments; the Investment Manager's ESG research is used to translate such results into ESG risk factor scores. Overall, the Investment Manager's proprietary methodology takes into consideration the ESG scores to form investment decisions. ESG scores are built using proprietary research, as well as data from third-party data providers. For more information on the Investment Manager's proprietary methodology:

www.alliancebernstein.com/corporate/en/corporate-responsibility/responsible-investing.html



The Methodology will retain the equities with the highest ESG scoring, by excluding at least 20% of the equities composing the Investment Universe with the lowest ESG scoring. More than 90% of the equities composing the Portfolio do benefit from an ESG rating.

Using equities selected through this ESG screening process, and a health care specific financial analysis, the Portfolio will be weighted in a discretionary manner as part of the Investment Manager's Methodology.

Environmental and/or social characteristics promoted by the Sub-Fund are met through the selection of equities based on the Investment Manager's ESG scoring (as described above).

The Portfolio will be rebalanced in compliance with the Methodology on a monthly basis. However, the Management Company may decide to rebalance the Portfolio at any 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 sub-fund applies at all times the binding elements of the investment strategy described below:

a) Sector exclusions

In accordance with the Société Générale group's Sector Policy, companies involved in activities related to the following sectors (based on specific thresholds) are excluded from the investment universe of the Sub-Fund.: prohibited or controversial weapons as defined by the Ottawa (1999) and Oslo (2008) conventions, thermal coal, oil & gas, tobacco and palm oil.

In addition, companies that directly or indirectly contravene any of the 10 main principles of the United Nations Global Compact are also excluded from the Sub-Fund's investment universe.

The details of the Management Company's Exclusion Policy (norm-based and sectorial exclusions) are available on the Exclusion Policy link on:

https://sg29haussmann.societegenerale.fr/en/regulation/

b) ESG integration:

The integration of ESG criteria aims to select stocks on the basis of their extra-financial behaviour. Within the Investment Universe, equities are ranked using proprietary ESG materiality sector weightings and a combination of fundamental ESG scores and third-party ESG management assessments.

More specifically, the Investment Manager's proprietary ESG scoring process, in combination with the exclusions outlined above, reduces the number of companies in the investible universe by at least 20%. These proprietary ESG scores are derived using a combination of third-party ESG Management scores and fundamental ESG review scores, both of which use the Investment Manager's proprietary ESG materiality weightings. For companies receiving a fundamental ESG score, this score will be the final issuer ESG score applied. Companies with ESG scores in the bottom 20% of all scores in the investible universe will be ineligible for inclusion in the Portfolio.

<u>Limit of the Methodology:</u>

The approach to SRI analysis of issuers implemented by the management company is based on a qualitative analysis of their environmental, social and governance practices. However, several limitations



to this approach can be identified. Some limits are linked to the management company's methodology, but others are also more broadly linked to the quality of the information available on these subjects.

Proprietary Data: The Investment Manager does not outsource any aspect of its ESG research, integration, engagement, or stewardship activities, meaning that proprietary data and analysis is often the basis for research conclusions. This data and analysis may differ from that provided by third-parties. For this reason, several of the Investment Manager's internal proprietary tools are used to serve as a "check and balance" by enabling the comparison of analyst's research conclusions from both internal and external resources.

The Investment Manger's Compliance Team periodically reviews internal ESG research and engagement records for quality and quantity. Its internal ESG Compliance Program also serves as an internal assurance mechanism through the sampling of ESG investment notes for reasonableness and to evidence stewardship activities.

Third Party Data: The Investment Managaer sources data from third-party providers to support its research teams in their analysis. Vendor coverage and methodology frequently changes and there may be significant differences in methodology between providers, resulting in different outcomes for similar datapoints. Agreements with third-party sources are reviewed every three years, and the Investment Manager's active working relationships with these organisations provide ongoing feedback on the quality and accuracy of data that is received. Where the Investment Manager's expectations have not been met by third-party data providers, it provides timely and actionable feedback and requests to fully understand the relevant methodologies, and proposes solutions to improve or augment those methodologies. AB helps identify discrepancies in data versus alternative providers and resolve disagreements on individual issuer assessments. AB's Market Data Team also acts as an escalation point for users when vendor issues are encountered.

Estimated Data: The Investment Manager conducts rigorous evaluations of data vendors when identifying third-party data sets to support analysis. However, there are occasions where third party data coverage is limited and inadequate for the specific use case across the investible universe and associated benchmarks. On such occasions of inadequate data coverage, the Investment Manager may use estimated data to support meaningful analysis at portfolio and benchmark levels. Where there are limitations to methodologies or data, the Investment Manager may use alternative data sources, conduct further research, or engage with the issuer in question to ensure that it meets the standards of the investment framework. ESG research conclusions will have documented and demonstrable alternative data and/or research to ensure the issuer satisfies the requirements of the framework. Where there are limitations in data, and subsequent analysis fails to clarify that an issuer follows good governance practices, then the issuer in question will not be eligible for investment until this limitation is satisfactorily met.

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

The evaluation of the governance practices of investee companies is an integral part of the Investment Manager's ESG scoring methodology (described in the question on the binding elements of the investment strategy).

In addition, the Investment Manager has developed a proprietary Good Governance Policy using a combination of external and internal data sources along with assessments or scoring based on specific governance criteria, including sound management structures, employee relations, remuneration of staff and tax compliance. The specific governance indicators include UN Global Compact principles and controversies related to the governance criteria. The foregoing Good Governance Policy is subject to, and dependent on, available data.



| 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?

□ 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.

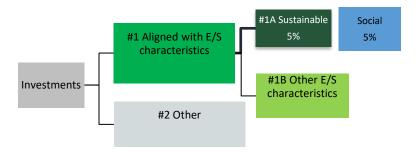
Consequently, as a result of such variable exposure, at least 50% of the Fund's net assets are subject to an ESG analysis or rating by the Management company, under normal market circumstances.

The Management Company considers as sustainable any investment in a company having a net positive contribution to the SDGs adopted by the United Nations and/or which contributes to the following environmental objectives as set out in Article 9 of the Taxonomy Regulation, for as long as this investment does not cause material prejudice to any of these objectives (according to the approach described in question 1 above) and that the companies receiving the investments apply good governance practices.

The Management Company relies on MSCI data and methodology to measure companies' alignment with the SDGs.

The sub-fund is not authorized to invest in non-ESG rated companies, outside of securities issued by public or quasi-public issuers, cash and cash equivalents.

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?

The minimum share of socially sustainable investment that the Financial Product partially intends to make shall be of a minimum of 5%.

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.



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 weekly 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 weekly 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)
- 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 weekly:

- 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

| ls engagement part of the environmental or social investment strategy? | | s engagemen | t part o | the | environmen | ta | l or social | inves | tmen | t stra | tegy | |
|--|--|-------------|----------|-----|------------|----|-------------|-------|------|--------|------|--|
|--|--|-------------|----------|-----|------------|----|-------------|-------|------|--------|------|--|

☐ Yes

⊠ No

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

N/A





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

| promoted by the financial product? | |
|------------------------------------|--|
| □Yes | |
| ⊠ No | |
| | |

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