

# Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:**  
 ECHIQUIER AGENOR SRI MID CAP EUROPE FUND

**Legal entity identifier:** 529900B8JFSLDIBA3F40

## Environmental and/or social characteristics

### 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 Taxonomy

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**: %

It **promotes environmental and social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



### What environmental and/or social characteristics are promoted by this financial product?

The SRI approach to managing the financial product aims to identify and select issuers that:

- Propose innovations and solutions to key issues: demography, urbanisation, environment, climate, agriculture, food, public health, etc.
- Anticipate the importance of these issues by acting responsibly in the four areas of the Management Company's SRI philosophy.

This analysis is based on the GREaT philosophy, which is specific to the Management Company and built around the following four pillars:

- Responsible governance
- Sustainable resource management
- Energy transition
- Regional development

The weight associated with each pillar for the calculation of the GREaT score of an issuer is adjusted according to its business sector in order to take into account its specific features. For example, the greenhouse gas reduction issue is not the same for a company in the services sector and an industrial company, as the former produces less emissions than the latter. In all cases, the weight of each of the three "Environmental", "Social" and "Governance" pillars, calculated by reassigning the criteria of the GREaT pillars, is between 20% and 60%.

The Sub-Fund has not designated a reference benchmark for the purpose of attaining the sustainable investment objective.

The Financial Product invests in sustainable investments within the meaning of Article 2 (17) of the SFDR.

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

The examples of indicators used for each of the E, S, and G criteria are as follows:

- Environmental indicators: environmental policy and actions, results of action plans put in place by the company, exposure of suppliers to environmental risks, positive or negative impact of products on the environment.
- Social indicators: attractiveness of the employer brand, employee retention, anti-discrimination, employee protection, exposure of suppliers to social risks, relations with civil society.
- Governance indicators: competence of the management team, checks and balances, respect for minority shareholders, business ethics.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The contribution to one of the aforementioned environmental and social objectives is assessed using various sources, including:

For all environmental and social objectives:

- The “GREaT” score, the proprietary quantitative analysis methodology of the LBP AM Group, which covers all environmental and social objectives,
- The “SDG” score, a proprietary qualitative analysis of LFDE that assesses companies’ products, services and practices with a view to measuring their contribution to achieving the United Nations Sustainable Development Goals (SDGs).

For objectives specific to climate and biodiversity:

- The issuer’s commitment to a decarbonisation trajectory in its activities compatible with the objectives of the Paris Agreement, according to criteria defined by the Management Company,
- The “Greenfin” score, a quantitative indicator measuring the exposure of the business model of an issuer to green activities as defined by the French government label Greenfin, dedicated to financing the energy and ecological transition,
- The “Bird” score, a proprietary quantitative indicator of the LBP AM Group that aims to assess companies primarily on their policies as well as on their practices and impacts related to biodiversity,
- The “Climate & Biodiversity Maturity” score, a proprietary qualitative analysis of LFDE that aims to assess the maturity of companies in their consideration of the current and future climate and biodiversity issues they face.

For the specific theme of access to healthcare:

- The “AAAA” (Acceptability, Accessibility, Affordability, Availability) score, a proprietary qualitative analysis of LFDE that aims to assess the contribution of companies through their products and services to the four dimensions of access to healthcare (Availability, Geographical Accessibility, Financial Accessibility, Acceptability) inspired by the work of the World Health Organization (WHO) on the subject

Additional information about the various scores is available in the “SFDR – Sustainable Investment Methodology” document available on the Management Company’s website (<https://www.lfde.com>), in the “Responsible Investment” section, on the “To find out more” page, under “LFDE Documents - SFDR”.

○ ***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?***

The Financial Product seeks to make environmental and social Sustainable Investments within the meaning of the SFDR Regulation. The minimum Sustainable Investment threshold of the Financial Product is specified in the box at the top of this annex. The sustainable investments thus made by the Financial Product can meet environmental and/or social objectives.

For the environmental theme, the six objectives of the European Taxonomy are considered, namely:

- Climate change mitigation,
- Climate change adaptation,
- Sustainable use and protection of water and marine resources,
- Transition to a circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.

Note that the methodology applied does not make it possible to measure the contribution of investments according to the definition of the European Taxonomy (i.e. the taxonomy alignment of investments).

However, the contribution of investments to environmental objectives within the meaning of Article 2(17) of Regulation (EU) 2019/2088 (“SFDR Regulation”) is measured using indicators specific to the LBP AM Group and specified above.

For the social theme, the objectives considered are:

- Respect and promotion of human rights, in particular the promotion of fair and favourable working conditions, social integration through work, protection and the promotion of rights of local communities,
- The development of territories and communities, through relations with stakeholders outside the company and the responsible management of value chains, and in order to address the challenges of socio-economic development, the fight against social and territorial divides, support for local players and access to education,
- Improving access to health and essential care worldwide by addressing the issues of availability, geographical accessibility, financial accessibility and acceptability of treatments.

This generalist strategy does not imply that all sustainable investments meet all of the aforementioned environmental and social objectives, but that the sustainable investments must meet at least one of these objectives, while not causing significant harm to the others.

A more complete description of the thresholds applied for each criterion is available in the “SFDR – Sustainable Investment Methodology” document accessible on the Management Company’s website (<https://www.lfde.com>), in the “Responsible Investment” section, on the “To find out more” page, under “LFDE Documents - SFDR”.

○ **How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?**

In order to ensure that an investment contributing to a sustainability objective, according to the analysis method presented above, does not cause significant harm to any environmental or social sustainable investment objective, the methodology applied systematically considers, on a cumulative basis:

- The issuer's practices relating to its management of human rights and environmental resources. This point is controlled using the proprietary "GREaT" extra-financial analysis methodology
- The issuer's exposure to sectors that are sensitive in terms of environmental and social aspects (such as thermal coal, controversial weapons, tobacco, gambling, etc.) in connection with the exclusion policies applicable in the Management Companies of the LBP AM Group. A more complete description of the exclusions is available in the "Exclusion Policy" document available on the Management Company's website (<https://www.lfde.com>), in the "Responsible Investment" section, on the "To find out more" page, under "LFDE Documents - Approach and Methodologies".
- The issuer's exposure to a severe controversy on environmental, social and governance issues, or a critical risk of serious breach of the OECD Guidelines for Multinational Enterprises and the UN Guidelines on Business and Human Rights.

- **How were the indicators for adverse impacts on sustainability factors taken into account?**

Commission Delegated Regulation (EU) 2022/1288 (hereinafter the "SFDR Delegated Regulation") defines a list of indicators to measure the adverse impacts of an issuer on environmental and social sustainability factors (hereinafter the "adverse impact indicators"). The adverse impact indicators are calculated for each issuer, when the data is available and integrated into the extra-financial analysis tool.

Some indicators have been directly integrated, either into the proprietary GREaT scoring methodology used to identify both a positive contribution or significant adverse impact, or into the controversy indicator mentioned above, or into the exclusion policies. The principal adverse impacts are also taken into account through the shareholder engagement approach with companies in order to improve their transparency on these indicators and reduce their negative externalities.

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

In order to ensure that the sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the United Nations Guidelines on Business and Human Rights, the Management Company systematically controls:

- The proper application of the Management Company's exclusion policy relating to these international treaties and the process for ad hoc controversy monitoring.
- The disqualification of issuers identified as having poor practices on the "Sustainable Resource Management" pillar of the GREaT analysis methodology, which incorporates criteria relating to respect for human rights and labour law.

A more complete description of the thresholds applied for each criterion is available in the "SFDR – Sustainable Investment Methodology" document accessible on the Management Company's website (<https://www.lfde.com>), in the "Responsible Investment" section, on the "To find out more" page, under "LFDE Documents - SFDR".

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria. The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account European Union criteria for environmentally sustainable economic activities. Any other sustainable investments must also not significantly harm any environmental or social objectives.

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

Yes

No

Regarding the adverse impacts, this financial product takes into account 14 mandatory indicators from Table 1 of Annex I of European Commission Delegated Regulation (EU) 2022/1288, and also includes the following two additional indicators:

- investments in companies without carbon reduction initiatives
- investments in companies without a workplace accident prevention policy

They are taken into account in the various areas of the management company's responsible investment approach: through the exclusion policy (sectoral and norm-based), the ESG analysis methodology, the various impact scores, the measurement and management of ESG performance indicators and engagement with companies.

Additional information about how the principal adverse impacts are taken into account is available in the document "Article 4 SFDR: Principal adverse impacts" accessible on the Management Company's website (<https://www.lfde.com>), in the "Responsible Investment" section, on the "To find out more" page, under "LFDE Documents - SFDR".

**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 and anti-corruption and anti-bribery matters.

Moreover, the Financial Product aims to obtain a better rating than that of its investment Universe on the following indicators:

Biodiversity: estimate of the impact of a company on biodiversity via the Global Biodiversity Score (the higher the score the greater the company's impact on biodiversity).

- Carbon footprint: Measures the CO2 emissions attributable to the Fund's investments. This indicator is expressed in tCO2 per million euros invested and covers scope 1, 2 and 3 emissions.



## What investment strategy does this financial product follow?

The subfund implements an active and discretionary management strategy, focused on equity markets in the European Union. The sub-fund is primarily exposed to European small and mid caps.

The manager carries out a rigorous securities selection via a two-step process:

- The first consists of analysing a universe of securities based on exclusion lists and the quantitative extra-financial rating of the issuers.
- The second aims to select securities according to their financial and extra-financial characteristics

### 1. First step: Analysis of the investment universe

The investment universe consists of the securities making up the Stoxx Europe Total Market. It is analysed using socially responsible investment (SRI) criteria, in order to identify the companies with the best practices in terms of sustainable development. This analysis is done using a proprietary tool of the LBP AM group: GREaT.

The extra-financial rating of issuers, which applies to all asset classes, is based on 4 pillars enabling a pragmatic and differentiating analysis:

- Responsible governance: this pillar aims in particular to assess the organisation and effectiveness of powers within each issuer (for example, for companies: assessing the balance of powers, executive remuneration, business ethics or tax practices);
- Sustainable resource management: this pillar makes it possible, for example, to examine the environmental impacts and human capital for each issuer (for example, quality of working conditions, management of relations with suppliers);
- The energy transition: this pillar makes it possible, for example, to assess each issuer's strategy to promote the energy transition (for example, greenhouse gas reduction approach, response to long-term challenges);
- Regional development: this pillar makes it possible, for example, to analyse each issuer's strategy in terms of access to basic services.

Thus, several criteria are identified for each pillar and monitored using indicators collected from various extra-financial rating agencies. The methodology makes it possible to reduce biases, particularly capital or sector biases, which could artificially improve the rating through allocation decisions. However, the analysis carried out depends on the quality of the information collected and the transparency of the issuers in question.

Moreover, the manager may propose a modification to the quantitative rating to support a qualitative analysis, and this modification would be subject to the approval of an ad hoc committee. The final score will be between 1 and 10 – an SRI score of 1 represents a low extra-financial quality and a score of 10 a high extra-financial quality.

Exclusions then serve as a second filter. An exclusion committee draws up a list of exclusions after analysing ESG controversies or allegations, defined in particular as severe and systematic legal breaches or ESG violations without corrective measures. The exclusion list also includes certain issuers in controversial sectors such as tobacco, gambling and coal, according to the criteria defined by the Management Company.

The analysis of the investment universe presented above allows for the elimination from the universe of 25% of the worst-rated issuers and/or the issuers on the exclusion lists applicable to the portfolio. This enables the pivot GREaT score to be defined. This pivot GREaT score is the score of the last issuer excluded from the universe after the above-mentioned adjustments. The portfolio can then invest in any issuer having a GREaT score higher than the pivot GREaT score of the portfolio.

### 2. Second step: Selection of securities according to their financial and extra-financial characteristics

At the end of this first step, the manager carries out a fundamental analysis of each issuer based on the following criteria:

- Analysis of the company's management
- Quality of its financial structure
- Visibility on the company's future results
- Analysis of financial results
- Growth prospects for its business
- The speculative aspect of the security

The quality of the governance will be subject to a special analysis which could restrict the manager in the securities selection.

Up to 10% of the securities may be selected outside the investment universe provided that these securities comply with the UCI's investment strategy and the constraints related to the exclusions and rating described above.

In any event, 90% of the portfolio's net assets are permanently made up of securities that have been subject to extra-financial analysis.

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

The mandatory elements used to select investments and achieve the environmental and social characteristics promoted by the Fund are as follows:

- the Management Company's exclusion policy and the resulting sectoral or norm-based exclusion constraints,
- the binding ESG assessment of each of the issuers in the portfolio via a quantitative analysis using the GREaT scoring tool (proprietary methodology of the LBP AM group),
- constraints associated with the sustainability indicators presented in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" above.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund follows a selection approach that consists of reducing the investment universe by the 25% worst-rated securities (based on the ESG ratings and all exclusions applied by the fund)

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

The monitoring of the application of good governance principles by issuers is controlled through:

- a quantitative indicator derived from the proprietary "GREaT" analysis methodology, the "Governance" pillar notably covering issues such as balance of powers, fair remuneration and business ethics.

An issuer is deemed to have applied the principles of good governance when this is demonstrated by the aforementioned indicator.

#### **Good governance**

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



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

### Asset allocation

describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies;
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy;
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The financial product invests at least 90% of its assets in assets considered "eligible" according to the ESG process implemented - therefore in investments that are aligned with the environmental and social characteristics promoted (#1 Aligned with E/S characteristics).

Up to 10% of investments are not aligned with these characteristics (#2 Other).

The financial product invests at least 40% of its assets in assets considered to be sustainable investments (#1A Sustainable).

A more detailed description of the specific asset allocation of this financial product can be found in its prospectus.



### ○ How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The derivatives used by the financial product are not intended to contribute to achieving the environmental or social characteristics promoted. Their use is limited to hedging or temporary exposure in order to cover a strong movement in liabilities, to gain temporary exposure to market beta or to accompany a change in strategy. Furthermore, the Management Company ensures that the use of derivatives does not run counter to the environmental or social characteristics promoted by the financial product. In particular, the Management Company does not use derivatives to artificially improve the product's extra-financial performance. The constraints relating to the use of derivatives are specified in the pre-contractual documentation for the financial product.



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

The financial product may invest in environmentally sustainable economic activities, however the investments of this financial product do not take into account the European Union criteria for environmentally sustainable economic activities. The financial product is committed to a 0% alignment with the European Taxonomy

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy?**<sup>(1)</sup>

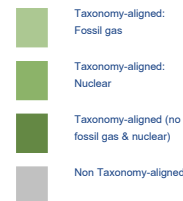
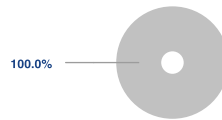
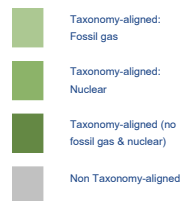
Yes

In fossil gas

In nuclear energy

No

*The two graphs below show in green the minimum percentage of investments aligned with the EU taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the taxonomy alignment in relation to all the investments of the financial product, including sovereign bonds, while the second graph shows the taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



This graph represents 100% of total investments.

\* For the purpose of these graphs, "sovereign bonds" consist of all sovereign exposures.

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

The financial product does not commit to a minimum proportion of investment in transitional and enabling activities.



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

This product intends to invest part of its assets in sustainable investments. These investments may contribute to environmental or social objectives, without any commitment being made as to the minimum share of each one. Thus, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%.



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

This product intends to invest part of its assets in sustainable investments. These investments may contribute to environmental or social objectives, without any commitment being made as to the minimum share of each one. Thus, the minimum share of sustainable investments with a social objective is 1%.



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

Investments included in the category "#2 Other" of the financial product represent up to 10% of investments. Depending on the eligible instruments as defined in the product's prospectus, these may include derivatives traded on regulated or organised markets to expose and hedge the portfolio, cash and unrated issuers. Derivatives and cash do not provide environmental or social safeguards.

To comply with the EU taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

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

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU taxonomy.

(1) Fossil gas and nuclear activities will only be aligned with the EU Taxonomy if they contribute to limiting climate change ("climate change mitigation") and do not cause significant harm to any other EU Taxonomy objective - see explanatory note in the left margin. All criteria applicable to economic activities in the fossil gas and nuclear energy sectors that comply with the EU Taxonomy are defined in Commission Delegated Regulation (EU) 2022/1214.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Not applicable

***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable



Where can I find more product specific information online?

**More information about the product is available on the website:**

More information about the Management Company's extra-financial approach can be obtained through the documents available on its website (<https://www.lfde.com>), in the "Responsible Investment" section, on the "To find out more" page, under "LFDE Documents - SFDR".

Additional information about the fund, in particular its regulatory documentation, is available on the Management Company's website ([www.lfde.com](http://www.lfde.com)), under the "Our Funds" section.