# COLUMBIA THREADNEEDLE (LUX) I

S I C A V

*A Luxembourg Undertaking*
*For Collective Investment*
*In Transferable Securities*
*Under Part I of the Law of*
*17 December 2010*

# P r o s p e c t u s

*23 February 2026*

**TABLE OF CONTENTS**


DIRECTORY ..... 4
IMPORTANT INFORMATION ..... 5
INTRODUCTION ..... 6
INVESTMENT OBJECTIVES AND POLICIES ..... 9
OTHER INVESTMENT PRACTICES ..... 57
RISK FACTORS ..... 59
THE SICAV ..... 77
THE MANAGEMENT COMPANY ..... 78
INVESTMENT MANAGEMENT ARRANGEMENTS ..... 80
CONFLICTS OF INTEREST ..... 80
PORTFOLIO TRANSACTIONS ..... 81
NET ASSET VALUE DETERMINATION ..... 81
NET ASSET VALUE PUBLICATION ..... 83
DILUTION ADJUSTMENT ..... 83
FEES AND EXPENSES ..... 83
DISTRIBUTION ARRANGEMENTS ..... 87
LUXEMBOURG ANTI-MONEY LAUNDERING REGULATIONS ..... 87
SHARE CLASSES ..... 88
PURCHASE OF SHARES ..... 95
REDEMPTION OF SHARES ..... 96
RESTRICTIONS ON SUBSCRIPTIONS AND CONVERSIONS INTO CERTAIN PORTFOLIOS ..... 97
MERGER OR LIQUIDATION ..... 97
EXCHANGE PRIVILEGE ..... 99
MARKET TIMING & LATE TRADING ..... 99
SUSPENSION OF ISSUE, REDEMPTION AND EXCHANGE OF SHARES AND CALCULATION OF NET ASSET VALUE ..... 100
DIVIDEND POLICY ..... 101
TAX CONSIDERATIONS ..... 101
RESTRICTIONS ON OWNERSHIP ..... 103
MEETINGS AND REPORTS ..... 103
SERVICE PROVIDERS ..... 103
DATA PROTECTION ..... 107
DOCUMENTS AVAILABLE FOR INSPECTION ..... 109
APPENDIX A INVESTMENT RESTRICTIONS ..... 110
APPENDIX B INVESTMENT TECHNIQUES AND INSTRUMENTS ..... 119
APPENDIX C PORTFOLIO CHARGES ..... 122
A SHARES: ..... 122
APPENDIX D PORTFOLIO CHARGES ..... 124
B SHARES: ..... 124
APPENDIX E PORTFOLIO CHARGES ..... 125
D SHARES: ..... 125
APPENDIX F PORTFOLIO CHARGES ..... 126
I SHARES: ..... 126
APPENDIX G PORTFOLIO CHARGES ..... 128
L SHARES: ..... 128
APPENDIX H PORTFOLIO CHARGES ..... 129
M SHARES: ..... 129
APPENDIX I PORTFOLIO CHARGES ..... 130
N SHARES: ..... 130
APPENDIX J PORTFOLIO CHARGES ..... 131
S SHARES: ..... 131
APPENDIX K PORTFOLIO CHARGES ..... 132
T SHARES: ..... 132
APPENDIX L PORTFOLIO CHARGES ..... 133
W SHARES: ..... 133
APPENDIX M PORTFOLIO CHARGES ..... 134
X SHARES: ..... 134
APPENDIX N PORTFOLIO CHARGES ..... 136
Z SHARES: ..... 136
APPENDIX O PORTFOLIO CHARGES ..... 138
CLASS 1 SHARES: ..... 138
APPENDIX P PORTFOLIO CHARGES ..... 139
CLASS 2 SHARES: ..... 139

APPENDIX Q PORTFOLIO CHARGES ..... 140
CLASS 3 SHARES: ..... 140
APPENDIX R PORTFOLIO CHARGES ..... 141
CLASS 4 SHARES: ..... 141
APPENDIX S PORTFOLIO CHARGES ..... 142
CLASS 8 SHARES: ..... 142
APPENDIX T PORTFOLIO CHARGES ..... 143
CLASS 9 SHARES: ..... 143
APPENDIX U GENERAL SUSTAINABILITY DISCLOSURES ..... 144
ANNEXES SFDR RTS ..... 149
CT (LUX) PAN EUROPEAN EQUITIES ..... 149
CT (LUX) GLOBAL FOCUS ..... 159
CT (LUX) SUSTAINABLE GLOBAL EQUITY INCOME ..... 169
CT (LUX) GLOBAL SELECT ..... 180
CT (LUX) GLOBAL SMALLER COMPANIES ..... 190
CT (LUX) AMERICAN SMALLER COMPANIES ..... 201
CT (LUX) ASIA EQUITIES ..... 211
CT (LUX) EUROPEAN SMALLER COMPANIES ..... 222
CT (LUX) EUROPEAN SELECT ..... 232
CT (LUX) EUROPEAN HIGH YIELD BOND ..... 242
CT (LUX) PAN EUROPEAN SMALLER COMPANIES ..... 253
CT (LUX) EUROPEAN CORPORATE BOND ..... 263
CT (LUX) GLOBAL CORPORATE BOND ..... 273
CT (LUX) GLOBAL EMERGING MARKET EQUITIES ..... 284
CT (LUX) EUROPEAN SOCIAL BOND ..... 294
CT (LUX) JAPAN EQUITIES ..... 304
CT (LUX) PAN EUROPEAN FOCUS ..... 314
CT (LUX) PAN EUROPEAN SMALL CAP OPPORTUNITIES ..... 323
CT (LUX) UK EQUITIES ..... 334
CT (LUX) US CONTRARIAN CORE EQUITIES ..... 344
CT (LUX) AMERICAN SELECT ..... 354
CT (LUX) AMERICAN ..... 364
CT (LUX) EUROPEAN SHORT-TERM HIGH YIELD BOND ..... 374
CT (LUX) EMERGING MARKET CORPORATE BONDS ..... 385
..... 394
CT (LUX) US DISCIPLINED CORE EQUITIES ..... 396
CT (LUX) GLOBAL REAL ESTATE SECURITIES ..... 406
GLOSSARY ..... 416

All capitalised terms used in this Prospectus are defined in the glossary.

# DIRECTORY

**Directors**

Annemarie Arens
Joseph LaRocque
Thomas Seale
Claude Kremer
Tina Watts

**Registered Office**

49, Avenue J.F. Kennedy,
L-1855 Luxembourg Grand Duchy of Luxembourg

**Management Company**

Threadneedle Management Luxembourg S.A.
6E, route de Trèves
L-2633 Senningerberg
Grand Duchy of Luxembourg

**Registrar and Transfer Agent**

SS&C Administration Services Luxembourg S.A.
49, Avenue John F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

**Directors of the Management Company**

Florian Uleer
Peter Stone
Marc C. Zeitoun
Jill Griffin
Michael Fisher

**Hong Kong Representative**

State Street Trust (HK) Limited
68/F Two International Finance Centre,
8 Finance Street, Central Hong Kong

**Depositary, Domiciliary, Administrative and Paying Agent**

State Street Bank International GmbH, Luxembourg Branch
49, Avenue J.F. Kennedy,
L-1855 LuxembourgGrand Duchy of Luxembourg

**Auditor of the Management Company**

PricewaterhouseCoopers, *société coopérative*
2, rue Gerhard Mercator, B.P. 1443
L-1014 Luxembourg
Grand Duchy of Luxembourg

**Auditor**

PricewaterhouseCoopers Assurance, *société coopérative*
2, rue Gerhard Mercator, B.P. 1443
L-1014 Luxembourg
Grand Duchy of Luxembourg

**Luxembourg Legal Advisers**

Linklaters LLP
35, Avenue John F. Kennedy, B.P. 1107
L-1011 Luxembourg
Grand Duchy of Luxembourg

## IMPORTANT INFORMATION

**No person may rely on any information other than that contained in this Prospectus or in the documents specified herein as being available for public inspection.**

If you are in any doubt about the contents of this Prospectus, you should consult an independent financial adviser. Shares are offered on the basis of the information contained in this Prospectus and the documents referred to herein. No dealer, sales representative or any other person is authorised to give any information or to make any representations concerning Columbia Threadneedle (Lux) I (the "SICAV"), other than as contained in this Prospectus, and any purchase made by any person on the basis of statements or representations not contained in or inconsistent with the information and representations contained in this Prospectus shall be solely at the risk of the purchaser.

The Directors, whose names appear under the heading "The SICAV", are the persons responsible for the information contained in this Prospectus. To the best knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case), the information contained in this Prospectus is in accordance with the facts and does not omit anything likely to affect the importance of such information. The Directors accept responsibility accordingly.

Statements made in this Prospectus are based on the laws and practice currently in force in the Grand Duchy of Luxembourg and are subject to changes in those laws.

**The price of the SICAV's Shares and any income earned on the Shares may go down as well as up. Future earnings and investment performance can be affected by many factors not necessarily within the control of the SICAV or its Directors or officers. For example, changes in exchange rates between currencies, changes in effective interest rates, or changes in market conditions due to a wide range of political or economic factors, as well as the performance of individual companies, may cause the value of an investment to fluctuate. No guarantees as to future performance of, or future return from, the SICAV can be given by the SICAV itself, or by any Director or officer of the SICAV, by the Management Company, or any of its affiliates, or by any of their directors or officers, or by any authorised dealers.**

Subscriptions are accepted only on the basis of the current Prospectus and/or Information document for retail and insurance-based investment products (the "PRIIPs KID") accompanied by the most recent annual report and any subsequent semi-annual report of the SICAV, when issued. Such reports form an integral part of this Prospectus. The Prospectus, the PRIIPs KID, the annual and semi-annual reports may be translated into other languages. In the case of any ambiguity, the English language version shall prevail to the extent permitted by applicable law.

The PRIIPs KID contains the essential characteristics of the SICAV, and shall be provided to investors before their proposed subscription of Shares. The PRIIPs KID is a pre-contractual document and investors will have to confirm that they have read the latest PRIIPs KID before making a subscription. The Management Company has the right to reject a subscription if the investor does not confirm that they have read the latest PRIIPs KID at the time of application. Investors can obtain the latest version of the PRIIPs KID on the website www.columbiathreadneedle.com.

Persons interested in purchasing Shares should inform themselves as to: (a) the legal requirements within their own countries for the purchase of Shares; (b) any foreign exchange restrictions which may be applicable; and (c) the income and other tax consequences of a purchase, exchange and/or redemption of Shares. In addition, certain distributors, selected dealers and financial intermediaries may not offer all of the SICAV's portfolios (the "Portfolios") or Classes described in this Prospectus. For more information, consult your distributor, selected dealer or financial intermediary.

The Portfolios have not been registered under the U.S. Investment Company Act of 1940. In addition, the Shares of each Portfolio have not been registered under the Securities Act and may not be and will not be offered for sale or sold in the United States, its territories or possessions or to a United States Person, except in certain transactions exempt from the registration requirements of the United States Securities Act of 1933 and such other securities laws. The Articles contain certain restrictions on the sale and transfer of Shares of each Portfolio to such persons. See the sections "The SICAV" and "Restrictions on Ownership" of this document.

No dealer, sales representative or any other person has been authorised to give any information or to make any representations, other than those contained in this Prospectus, or in any documents referred to herein as being available for inspection by the public, in connection with the offer made hereby, and, if given or made, such information or representations must not be relied upon as having been authorised by the SICAV or the Management Company. Applications for Shares of any Portfolio are subject to acceptance by the SICAV.

This Prospectus does not constitute, and may not be used for the purposes of, an offer or invitation to subscribe for any Shares by any person in any jurisdiction (i) in which such offer or invitation is not authorised; (ii) in which the person making such offer or invitation is not qualified to do so; or (iii) to any person to whom it is unlawful to make such offer or invitation.

Prospective purchasers of Shares should inform themselves as to the legal requirements, exchange control regulations and applicable taxes in the countries of their respective citizenship, residence or domicile.

## INTRODUCTION

Columbia Threadneedle (Lux) I is an investment company with variable capital ("*société d'investissement à capital variable*") formed under the laws of the Grand Duchy of Luxembourg and qualifies in Luxembourg as a UCITS.

The SICAV offers investors the opportunity to invest in separate Portfolios. Each Portfolio has a different investment objective and is a separate portfolio of assets represented by separate Shares. Each Portfolio may have one or more Classes of Shares related to it. The SICAV as a whole, including all of the existing Portfolios and all future Portfolios, is one legal entity. However, with regard to third parties and, in particular, with regard to the SICAV's creditors and as between Shareholders, each Portfolio shall be exclusively responsible for all liabilities attributable to it.

Threadneedle Management Luxembourg S.A. has been appointed as the Management Company to the SICAV.

The Portfolios of the SICAV are as follows:

**The Bond Portfolios**

| **Name of Portfolio** | **Base Currency** |
|---|---|
| CT (Lux) Global Corporate Bond (hereafter "Global Corporate Bond") | USD |
| CT (Lux) European Corporate Bond (hereafter "European Corporate Bond") | EUR |
| CT (Lux) European High Yield Bond (hereafter "European High Yield Bond") | EUR |
| CT (Lux) European Short-Term High Yield Bond (hereafter "European Short-Term High Yield Bond") | EUR |
| CT (Lux) European Social Bond (hereafter "European Social Bond") | EUR |
| CT (Lux) European Strategic Bond (hereafter "European Strategic Bond") | EUR |
| CT (Lux) Emerging Market Corporate Bonds (hereafter "Emerging Market Corporate Bonds") | USD |
| CT (Lux) Emerging Market Debt (hereafter "Emerging Market Debt") | USD |
| CT (Lux) Global Emerging Market Short-Term Bonds (hereafter "Global Emerging Market Short-Term Bonds") | USD |
| CT (Lux) US High Yield Bond (hereafter "US High Yield Bond") | USD |
| CT (Lux) Flexible Asian Bond (hereafter "Flexible Asian Bond") | USD |

(each, a "Bond Portfolio", and together, the "Bond Portfolios")

**The Asset Allocation Portfolios**

| **Name of Portfolio** | **Base Currency** |
|---|---|
| CT (Lux) Global Dynamic Real Return (hereafter "Global Dynamic Real Return") | USD |
| CT (Lux) Global Multi Asset Income (hereafter "Global Multi Asset Income") | USD |

(each, an "Asset Allocation Portfolio", and together the "Asset Allocation Portfolios")

**The Equity Portfolios**

| Name of Portfolio | Base Currency |
|---|---|
| CT (Lux) Global Focus (hereafter "Global Focus") | USD |
| CT (Lux) Global Emerging Market Equities (hereafter "Global Emerging Market Equities") | USD |
| CT (Lux) Sustainable Global Equity Income (hereafter "Sustainable Global Equity Income") | USD |
| CT (Lux) Global Select (hereafter "Global Select") | USD |
| CT (Lux) Global Smaller Companies (hereafter "Global Smaller Companies") | EUR |
| CT (Lux) American (hereafter "American") | USD |
| CT (Lux) American Select (hereafter "American Select") | USD |
| CT (Lux) American Smaller Companies (hereafter "American Smaller Companies") | USD |
| CT (Lux) Asia Equities (hereafter "Asia Equities") | USD |
| CT (Lux) US Contrarian Core Equities (hereafter "US Contrarian Core Equities") | USD |
| CT (Lux) US Disciplined Core Equities (hereafter "US Disciplined Core Equities") | USD |
| CT (Lux) Pan European Equities (hereafter "Pan European Equities") | EUR |
| CT (Lux) Pan European Focus (hereafter "Pan European Focus") | EUR |
| CT (Lux) Pan European Small Cap Opportunities (hereafter "Pan European Small Cap Opportunities") | EUR |
| CT (Lux) Pan European Smaller Companies (hereafter "Pan European Smaller Companies") | EUR |
| CT (Lux) European Select (hereafter "European Select") | EUR |
| CT (Lux) European Smaller Companies (hereafter "European Smaller Companies") | EUR |
| CT (Lux) Asian Equity Income (hereafter "Asian Equity Income") | USD |
| CT (Lux) Global Technology (hereafter "Global Technology") | USD |
| CT (Lux) UK Equities (hereafter "UK Equities") | GBP |
| CT (Lux) UK Equity Income (hereafter "UK Equity Income") | GBP |
| CT (Lux) Japan Equities (hereafter "Japan Equities") | JPY |

(each, an "Equity Portfolio", and together, the "Equity Portfolios")

**The Absolute Return Portfolios**

| Name of Portfolio | Base Currency |
|---|---|
| CT (Lux) Credit Opportunities (hereafter "Credit Opportunities") | EUR |
| CT (Lux) Pan European Absolute Alpha (hereafter "Pan European Absolute Alpha") | EUR |

(each, an "Absolute Return Portfolio", and together, the "Absolute Return Portfolios")

**The Extended Alpha Portfolios**

| Name of Portfolio | Base Currency |
|---|---|
| CT (Lux) American Extended Alpha (hereafter "American Extended Alpha") | USD |
| CT (Lux) Global Extended Alpha (hereafter "Global Extended Alpha") | USD |
| CT (Lux) Global Real Estate Securities (hereafter "Global Real Estate Securities") | USD |

(each, an "Extended Alpha Portfolio", and together, the "Extended Alpha Portfolios")

**The Specialist Portfolio**

| Name of Portfolio | Base Currency |
|---|---|
| CT (Lux) Enhanced Commodities (hereafter "Enhanced Commodities") | USD |

(the "Specialist Portfolio")

Details of the target market for each of the Portfolios is available as part of the European MiFID Template (EMT) on the website www.columbiathreadneedle.com. This includes the types of investors the Portfolio is targeted at, their knowledge and experience and risk tolerance.

Multiple Share Classes are available in respect of each Portfolio as described under "Share Classes" below.

**The Shares presently issued are offered for sale, where legally permitted, and all subscriptions are accepted on the basis of the current Prospectus and either the last available annual report of the SICAV containing its audited accounts, or the most recent semi-annual report which are available at the registered office of the SICAV.**

## INVESTMENT OBJECTIVES AND POLICIES

Set forth below are the investment objectives and policies of each Portfolio. The SICAV is authorised, by amendment to the Prospectus, to offer Shares in additional Portfolios if and when the Directors and the Management Company determine that there is sufficient interest in any such additional Portfolio to warrant an offering of its Shares. There can be no assurance that any Portfolio will achieve its investment objective. The Net Asset Value of the Portfolios shall be expressed in the Base Currency of the Portfolio (as set out under "Introduction" section above). Certain Share Classes of the Portfolios may be expressed in currencies other than the Base Currency as noted under "Share Classes" below.

In addition to the following investment objectives and policies, each Portfolio may employ the investment practices described under "Other Investment Practices" and in Appendix A "Investment Restrictions" and in Appendix B "Investment Techniques and Instruments".

A Portfolio may invest in another Portfolio under the conditions set forth by Luxembourg laws and regulations.

The attention of the investors is drawn to the fact that investing in the following Portfolios may involve specific risks described under "Risk Factors" below. Investors should consider such risks before investing in any of the Portfolios especially risks linked to investment in financial derivative instruments when appropriate.

THE BOND PORTFOLIOS:

## Global Corporate Bond

The Global Corporate Bond Portfolio seeks to achieve a total return from income and capital appreciation by investing principally, either directly or indirectly through derivatives, in a portfolio focused on Investment Grade corporate debt fixed income and floating rate securities. The Portfolio may also invest up to one third of its assets in debt securities other than Investment Grade corporates including, but not limited to, government and below Investment Grade securities, which may include, without being limited to, asset-backed and/or mortgage-backed Transferable Securities (not exceeding 20% of the Portfolio's Net Asset Value).

The Portfolio may use financial derivative instruments for investment purposes and hedging. These derivatives may include, but are not limited to, foreign currency exchange and over the counter contracts, futures and options on Transferable Securities, interest rate swaps and credit default swaps.

Where securities are denominated in a currency other than U.S. Dollars it is intended that they will typically be hedged back into U.S. Dollars.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the Bloomberg Global Aggregate Corporate Index (USD Hedged). The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total returns through income and capital appreciation;
- seek investment exposure to global corporate credit bond markets;
- seek an investment that promotes environmental and social characteristics;
- are willing to take on a moderate level of risk;
- have a medium-term investment horizon.

## European Corporate Bond

The European Corporate Bond Portfolio seeks to achieve a total return from income and capital appreciation by investing in fixed income securities that are primarily denominated in Euro.

The Portfolio will principally invest in a broad range of Investment Grade fixed income securities issued by companies domiciled in Europe or which have significant European operations. It may also invest in Investment Grade securities that are issued by sovereign and supranational borrowers. However, it is intended that the Portfolio will not invest more than 25% of its net assets in securities that are rated AAA (Standard & Poor's) or an equivalent rating from another leading rating agency. A maximum of 10% of the Portfolio's net assets can be invested in securities that are rated below Investment Grade. The Portfolio may invest in mortgage and asset-backed securities (the mortgage and asset-backed securities not exceeding 10% of the Portfolio's Net Asset Value) and CoCos (not exceeding 10% of the Portfolio's Net Asset Value).

Where securities are denominated in a currency other than Euro it is intended that they will typically be hedged back into Euro.

The Portfolio may use financial derivative instruments for the purpose of reducing risks or costs, i.e. where the use of a financial derivative instrument is economically appropriate.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the iBoxx Euro Corporate Bond Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex to this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total returns through income and capital appreciation;
- seek investment exposure to European corporate bond markets;
- seek an investment that promotes environmental and social characteristics;
- are willing to tolerate moderate price fluctuations and to take on a moderate level of risk;
- have a medium-term investment horizon.

## European High Yield Bond

The European High Yield Bond Portfolio seeks to achieve a total return from income and capital appreciation by investing principally in Euro or Sterling denominated fixed income securities that are rated below Investment Grade.

The Portfolio will principally invest in fixed income securities issued by companies domiciled in Europe, or with significant European operations.

The Portfolio may invest in CoCos (not exceeding 10% of the Portfolio's Net Asset Value).

Where securities are denominated in a currency other than Euro it is intended that they will typically be hedged back into Euro.

The Portfolio may use financial derivative instruments for the purpose of reducing risks or costs, i.e. where the use of a financial derivative instrument is economically appropriate.

The weighted average credit rating of the Portfolio is expected to be between Ba2 and B2 as rated by Moody's (or equivalent).

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek a potential total return primarily by way of income;
- seek investment exposure to European corporate bond markets and seek diversification in their investments through exposure to the Euro denominated high-yield market;
- seek an investment that promotes environmental and social characteristics;
- are willing to tolerate moderate to large price fluctuations and have hence a moderate to high risk tolerance;
- have a medium to long term investment horizon.

## European Short-Term High Yield Bond

The European Short-Term High Yield Bond Portfolio seeks to achieve a total return from income with some capital appreciation. The Portfolio will seek to deliver returns with lower volatility than that of the short-term European high yield bond market.

The Portfolio is actively managed and will seek exposure, directly or indirectly, to credit rated below Investment Grade, that is issued by companies domiciled in Europe or with significant European operations, or is denominated in EUR or GBP and whose residual maturity does not exceed 4 years.

The Portfolio will invest at least 50% of its net assets directly in fixed income securities that meet the criteria above, and the Portfolio will maintain a net credit exposure as described above of at least two-thirds of its net assets.

Secondarily, the Portfolio may also invest in other transferable securities (typically debt-related instruments such as index-linked debt securities) and UCIs, including ETFs.

The Portfolio may invest up to 20% of its net assets in asset-backed and/or mortgage-backed transferable securities.

The weighted average credit rating of the Portfolio is expected to be between Ba2 and B2 (or equivalent). The Portfolio's exposure to fixed income securities rated Caa1 (or equivalent) or below will not exceed 10% of the Portfolio's net assets.

The Portfolio may use financial derivative instruments for investment purposes and hedging. Where securities are denominated in a currency other than Euro it is intended that they will typically be hedged back into Euro.

Certain positions will be taken by the use of financial derivative instruments including, but not limited to, swaps (incl. total return swaps as described below or credit default swaps (CDS)), forward positions, futures and options related to the instruments above in accordance with section A(7)(i) in Appendix A "Investment Restrictions".

The Portfolio may enter into total return swaps (a general description of total / excess return swaps is available in Appendix B.I) on credit instruments or cash credit indices for hedging and / or investment purposes, to gain market exposure and liquidity or as part of a leveraged long strategy. For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

It is expected that any of the assets of the Portfolio may be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value**[1] | **Expected proportion of Net Asset Value**[2] |
|---|---|---|
| Total return swaps | 20% | 5% |

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is not managed in reference to a benchmark.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

[1] The proportion is determined on the basis of the Sum of Notionals approach.
[2] The proportion is determined on the basis of the Sum of Notionals approach.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek a potential total return by way of income with some capital appreciation;
- seek investment exposure to European corporate bond markets and seek diversification in their investments through exposure to the European short-term high yield bond market;
- seek an investment that promotes environmental and social characteristics;
- are willing to take on a moderate level of risk;
- have a medium-term investment horizon.

## European Social Bond

The European Social Bond Portfolio is actively managed and seeks to achieve a total return from income and capital appreciation by investing in debt securities that are considered to provide positive social outcomes by supporting or funding socially beneficial activities and development principally in Europe.

To meet its objective, the Portfolio invests at least 90% of its net assets in all forms of debt securities issued by a government or a supranational, public, private or voluntary and/or charitable sector organisation, whether they have a fixed, floating, variable or index-linked rate or have a zero coupon. These securities may include covered bonds, agency bonds, mortgage and asset-backed securities (the mortgage and asset-backed securities not exceeding 10% of the Portfolio's Net Asset Value) and Contingent Convertible Bonds (not exceeding 10% of the Portfolio's Net Asset Value).

The Portfolio will not invest or have more than 10% of its net assets in debt securities that are rated below Investment Grade, provided that such securities are not rated below B- or equivalent by any NRSRO at the time of purchase.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Investment Manager will only select debt securities that are rated as social investments under the Social Rating Methodology, as described below, as well as ensuring that the issuers of these securities follow good governance practices. This means that the Investment Manager will apply these non-financial selection criteria to at least 90% of the total net assets of the Portfolio, excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes.

The Portfolio is not managed in reference to a benchmark.

The ICE BofA Euro Non-Sovereign Index (50%) and ICE BofA Euro Corporate Euroland Issuers Index (50%) is currently used as a point of comparison against which the Portfolio's financial performance may be compared. Through the application of the investment and assessment process set out below, the Investment Manager expects to exclude at least 20% of the constituents of the index. The Portfolio is otherwise not subject to any constraints in relation to the comparator index, and as a result of the application of the Social Rating Methodology is expected to exhibit significant deviation from the index.

**Overview of the investment and assessment processes**

Investment process

The Investment Manager's investment process to achieve the social objective is summarised as follows:

1. Creating the social universe of investments by identifying categories of bonds with higher potential for delivering one of 7 areas of social outcome (such as affordable housing, health and welfare, economic regeneration and development) while excluding those with negative social characteristics.
2. Adhering to particular social norms to ensure that no bond held by the Portfolio violates set standards.
3. A focus on positive inclusion by carrying out a detailed assessment of the bond's contribution to positive social outcomes.
4. Ongoing governance, monitoring, engagement and reporting to maintain and enhance the Portfolio's social focus and standards.

In applying the investment process, the Investment Manager will select the debt securities based on credit analysis and the social rating and categorisation produced under the Social Rating Methodology. The Social Rating Methodology is a proprietary categorisation and rating model developed by the Investment Manager, which analyses the social characteristics of each potential investment. Under the methodology, each investment will be analysed under a process that:

(i) assesses the broad social intentionality associated with the use of a bond's proceeds, to categorise it as either an impact investment, an investment with impact, or as development finance, otherwise the investment is assessed as general financing and lies outside the social universe eligible for investment;

(ii) assesses the broad social intensity by applying a three stage assessment model that examines nine characteristics of the social outcomes attributable to a bond to derive a numerical score that, subject to a de-minimis threshold, produces a social rating of minor, moderate, good or strong.

The categorisation and ratings are then used by the Investment Manager in constructing the Portfolio. A bond rated as, or whose rating falls, below the de-minimis threshold is subject to review and re-categorisation as general financing.

As part of its investment process, the Investment Manager assesses the Portfolio's investments to ensure that, while positively contributing to social outcomes, the bonds do not significantly harm other social (including environmental) sustainability objectives.

The Investment Manager considers the principal adverse impacts ("**PAIs**") of its investment decisions that may negatively harm sustainability factors through ensuring minimum standards, investment research and monitoring and engaging with issuers in respect of the PAI indicators detailed in the SFDR RTS Annex of this Prospectus.

Assessment and research process

The Investment Manager has partnered with INCO (http://inco.co.com/), an organisation specialising in impact investment, to provide assistance in assessing and reporting on the social outcomes of the Portfolio and providing research on trends and practices relevant to impact investment.

To that end, a Social Advisory Panel (or "**SAP**"), composed of 2 members nominated by the Investment Manager, 3 members nominated by INCO and 2 independent appointees, has been established to review, advise on and monitor the application and development of the Social Rating Methodology as well as to review the actual social outcomes of investments that have been made by the Investment Manager.

An annual social impact report, prepared by INCO and approved by the SAP, will be made available to investors.

**Promotion of Social Objective**

The Portfolio is considered to be within the scope of Article 9 of SFDR as it has a social (and hence sustainable) investment objective.

Further information on the Portfolio's investment guidelines is included in the Social Investment Guidelines available at columbiathreadneedle.com.

Please also refer to the General Sustainability Disclosures Appendix in this Prospectus for further information.

Information about the sustainable investment objective of the Portfolio is available in the SFDR RTS of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total returns through income and capital appreciation;
- seek exposure to European fixed income markets through investments deemed to be supporting and funding socially beneficial activities and development. The investor should be aware that geographic concentration in Europe may add more volatility than a more broadly diversified portfolio;
- seek an investment that has a sustainable investment objective;
- are willing to take on a moderate level of risk;
- have a medium-term investment horizon.

## European Strategic Bond

The European Strategic Bond Portfolio seeks to achieve total return from income and capital appreciation by investing principally in short to-medium term European sovereign bonds and corporate bonds (including Contingent Convertible Bonds for up to 5% of the Portfolio's Net Asset Value), that are Investment Grade or non-Investment Grade, primarily issued by companies domiciled in Europe or with significant operations in Europe.

The Portfolio may also use financial derivative instruments for investment purposes, hedging and efficient portfolio management. These derivatives may include, but are not limited to, foreign currency exchange contracts, futures on transferable securities and interest rate swaps. The Portfolio seeks to actively manage currency exposure and interest rate risk through the use of such derivative instruments.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the ICE BofA 1-7 Year All Euro Government Index (20%), ICE BofA 1-10 Year Euro Corporate Index (40%) and ICE BofA European Currency High Yield Constrained Index (40%). The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total return through income and capital appreciation;
- seek to diversify their investments through exposure to European debt;
- seek active management of interest rate risk;
- will accept moderate volatility and moderate to high level of risk;
- have a medium to long-term investment horizon.

## Emerging Market Corporate Bonds

The Emerging Market Corporate Bonds Portfolio is actively managed and seeks to achieve total return from income and capital appreciation by investing principally in U.S. Dollar-denominated or U.S. Dollar hedged Investment Grade and below Investment Grade debt and other obligations issued or guaranteed by institutions and corporations having their head office in, or conducting a significant part of their business in, Emerging Market Countries.

The Portfolio may secondarily invest in other debt securities, including bonds issued by sovereign borrowers from Emerging Market Countries and bonds issued by sovereign and corporate borrowers from OECD.

Up to 10% of the Portfolio's Net Asset Value may be invested in bonds traded on the China Interbank Bond Market using Bond Connect.

Emerging market investments are more volatile and present higher risk than investments in more established markets. Investors should consider this extra risk when evaluating the potential benefits of investing in this Portfolio.

The Portfolio may also use financial derivative instruments for investment purposes, hedging and efficient portfolio management. These derivatives may include, but are not limited to, foreign currency exchange contracts, interest rate swaps, interest rate futures and credit default swaps.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the J.P. Morgan CEMBI Broad Diversified Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek returns from both income and capital appreciation;
- seek to diversify their investments through exposure to emerging market corporate debt;
- seek an investment that promotes environmental and social characteristics;
- will accept high volatility and high level of risk;
- have a medium to long-term investment horizon.

## Emerging Market Debt

The Emerging Market Debt Portfolio is actively managed and seeks to achieve total return from income and capital appreciation by investing principally in sovereign bonds and corporate bonds issued by borrowers from Emerging Market Countries.

Up to 10% of the Portfolio's Net Asset Value may be invested in bonds traded on the China Interbank Bond Market using Bond Connect.

The Portfolio may further invest in other fixed income securities, including bonds issued by countries making up the G-7.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the J.P. Morgan EMBI Global Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total return through income and capital appreciation;
- seek diversification within their investments through exposure to emerging market debt;
- can tolerate the high volatility associated with emerging market debt;
- are willing to take on a high level of risk;
- have a long-term investment horizon.

## Global Emerging Market Short-Term Bonds

The Global Emerging Market Short-Term Bonds Portfolio is actively managed and seeks to achieve total return from income and capital appreciation by investing principally in a globally diversified range of Transferable debt Securities. Such securities will be issued or guaranteed by emerging market sovereignties or supranational entities, or financial institutions or corporations headquartered in Emerging Market Countries. The Portfolio may also invest secondarily in debt securities issued or guaranteed by G-7 sovereignties or supranational entities and in credit linked notes.

The Portfolio may invest in securities denominated in various currencies and will generally hedge non-U.S. Dollar exposures. However, the maximum amount of non-U.S. Dollar exposure remaining unhedged will not exceed 35% of the net assets of the Portfolio. At the same time, the maximum amount of non-U.S. Dollar exposure remaining unhedged in any one currency will not exceed 10% of the net assets of the Portfolio. The Portfolio will have an average duration of five years or less.

Up to 10% of the Portfolio's Net Asset Value may be invested in bonds traded on the China Interbank Bond Market using Bond Connect.

The Portfolio may also use financial derivative instruments for investment purposes, hedging and efficient portfolio management. These derivatives may include, but are not limited to, foreign currency exchange contracts, interest rate swaps, interest rate futures and credit default swaps.

Emerging market investments are more volatile and present higher risk than investments in more established markets. Investors should consider this extra risk when evaluating the potential benefits of investing in this Portfolio.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the J.P. Morgan EMBI Global 3-5 Years Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total return through income and capital appreciation;
- seek diversification within their investments through exposure to emerging market short-term debt;
- can tolerate the high volatility associated with emerging market debt;
- are willing to take on a high level of risk;
- have a long-term investment horizon.

## US High Yield Bond

The US High Yield Bond Portfolio seeks to achieve total return from capital appreciation and income by investing principally in income-producing U.S. Dollar denominated debt securities with an emphasis on the High Yield (i.e. below investment grade) market. The Portfolio will invest under normal circumstances at least two thirds of its net assets in a diversified portfolio of debt securities that are rated below Investment Grade. The Portfolio will not generally purchase debt securities rated below "C" by S&P or by Moody's or that have an equivalent rating by another NRSRO, or are unrated and believed to be of similar quality. All ratings apply at the time the investment is made. If the rating of a security changes subsequent to purchase, the security may continue to be held at the Investment Manager's discretion.

The Portfolio may invest secondarily in other securities and may employ other investment strategies that are not principal investment strategies. The Portfolio's policies permit investment in other Transferable Securities, including non-income-producing securities and common stocks. The Portfolio may invest up to 25% of its net assets in non-U.S. securities and up to 10% of its net assets in non-U.S. Dollar denominated securities.

The Portfolio may also use financial derivative instruments for investment purposes, hedging and efficient portfolio management. These derivatives may include, but are not limited to, interest rate futures, interest rate options, interest rate swaps, total/excess return swaps and credit default swaps.

Investment in debt securities rated below Investment Grade entails special risks and may not be appropriate for all investors.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the ICE BofA US Cash Pay High Yield Constrained Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Use of total return swaps:**

The Portfolio may enter into total return swaps (a general description of total/excess return swaps is available in Appendix B.I) on high yield instruments or indices for investment purposes or to gain market exposure while managing flows.

It is expected that the assets of the Portfolio will be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value[3]** | **Expected proportion of Net Asset Value[4]** |
|---|---|---|
| Total return swaps | 10% | 5% |

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total return through higher income and capital appreciation;
- seek diversification in their investments through exposure to the U.S. Dollar denominated high-yield market;
- can tolerate the high price volatility and lower liquidity associated with lower-rated debt securities;
- are willing to take on a high level of risk;
- have a long-term investment horizon.

[3] The proportion is determined on the basis of the Sum of Notionals approach.
[4] The proportion is determined on the basis of the Sum of Notionals approach.

## Flexible Asian Bond

The Flexible Asian Bond Portfolio is actively managed and seeks to achieve a total return from income and capital appreciation by investing principally, either directly or indirectly through derivatives, in a portfolio of government and non-government fixed income and floating rate securities (including covered bonds, perpetual bonds, and callable and puttable bonds) that are either Investment Grade or below Investment Grade at the time of purchase, and when determined appropriate cash and Money Market Instruments. The Portfolio may also invest in asset-backed Transferable Securities (not exceeding 20% of the Portfolio's Net Asset Value), Convertible Bonds and preference shares. These securities will be denominated either in U.S. Dollars or in Asian currencies (with the exclusion of Japanese Yen) and issued or guaranteed by institutions and corporations having their head office in, or exercising the predominant part of their economic activity in Asia (with the exclusion of Japan). The Portfolio may also invest in currencies, including non-Asian currencies, either directly or indirectly through financial derivative instruments.

Up to 20% of the Portfolio's Net Asset Value may be invested in bonds traded on the China Interbank Bond Market using Bond Connect.

The Portfolio may use financial derivative instruments for investment and hedging purposes. These derivatives may include, but are not limited to, deliverable and non-deliverable forward foreign exchange contracts (relating to Asian and non-Asian currencies), futures and options on Transferable Securities, interest rate swaps and credit default swaps.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the J.P. Morgan Asia Credit Index Diversified. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total returns through income and capital appreciation;
- seek investment exposure to Asian (excluding Japan) bond markets. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- can tolerate the high price volatility and lower liquidity associated with lower-rated and other less-liquid debt securities;
- are willing to take on a high level of risk;
- have a long-term investment horizon.

THE ASSET ALLOCATION PORTFOLIOS:

## Global Dynamic Real Return

The Global Dynamic Real Return Portfolio seeks to achieve a real rate of return, i.e. above the rate of inflation (as measured by the US CPI Seasonally Adjusted Index) from income and capital appreciation.

The Portfolio is actively managed and will invest globally principally in the equity and fixed income securities of both government and corporate issuers, either directly, or indirectly through financial derivative instruments and/or collective investment schemes, as well as in forward currency exchange contracts and, when determined appropriate on a defensive basis, in cash and Money Market Instruments. The Portfolio may also gain indirect exposure to commodities through, but not limited to, investment in collective investment schemes, securitised notes and/or financial derivative instruments where such derivatives' underlying instruments are indices. The Portfolio will not invest in physical commodities or property.

The Portfolio may use financial derivative instruments and forward transactions for both efficient portfolio management and investment purposes. The use of derivatives for investment purposes may increase the risk profile of the Portfolio.

The Portfolio retains the flexibility to vary its exposure between asset classes where it deems necessary in order to achieve the investment objective.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation in a globally asset-allocated portfolio;
- seek to add diversification to their investments through exposure to global equities, fixed income, cash, currencies and commodities;
- have a medium to high level of risk tolerance;
- have a medium- to long-term investment time horizon.

## Global Multi Asset Income

The Global Multi Asset Income Portfolio seeks to achieve an income with the prospect of capital appreciation over the medium to long term.

The Portfolio is actively managed and will typically maintain a 40-60% allocation to global equity securities and a 40-60% allocation to global fixed income securities (including those rated below Investment Grade). The Portfolio may further invest in other securities globally (including currencies, REITs, convertible debt securities and other asset classes).

The Portfolio's exposure to fixed income securities which are either distressed or in default will not exceed 10% of the Portfolio's net assets. The Portfolio will not actively purchase such securities.

The Portfolio may invest in other UCITS or UCIs, and may use derivatives for investment purposes and hedging, including the generation of additional income[5]. Such derivatives may include but are not limited to, futures and options, interest rate swaps, and foreign currency exchange contracts.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI ACWI NR Index (50%), ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index (USD Hedged) (30%) and Bloomberg Global Aggregate Index (USD Hedged) (20%)[6]. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek potential total returns from income and capital appreciation;
- seek investment diversification through exposure to global fixed income and equity markets;
- will accept moderate to high volatility and a moderate to high level of risk;
- have a medium to long-term investment horizon.

[5] Until 1 April 2026 inclusive, the Portfolio may invest **up to 10%** in other UCITS or UCIs.

[6] Until 1 April 2026 inclusive, the Portfolio will be actively managed in reference to the MSCI ACWI Index (45%), ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index (USD Hedged) (30%), Bloomberg Global Aggregate Index (USD Hedged) (20%) and 30-day Average Secured Overnight Financing Rate (SOFR) (5%).

## Global Focus

The Global Focus Portfolio seeks to achieve capital appreciation by investing principally in a concentrated portfolio of equity securities of corporate issuers listed, domiciled or conducting a significant part of their business in developed and Emerging Market Countries. Secondarily, the Portfolio may invest in securities convertible into equity securities and/or warrants.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI ACWI Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation through a globally-focused equity fund;
- seek investment diversification through exposure to global equities;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- can tolerate high volatility in the value of their investment;
- have a long-term investment horizon.

## Global Emerging Market Equities

The Global Emerging Market Equities Portfolio seeks to achieve long-term capital appreciation by investing principally in the equity securities of Emerging Market Countries companies. These are defined as companies domiciled in and/or whose significant activities are in Emerging Market Countries. The Portfolio may further invest in other securities (including fixed income securities and other equities).

The Portfolio may invest up to 30% of its Net Asset Value in China A-Shares through the China-Hong Kong Stock Connect Programme.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Emerging Markets Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation through a global emerging market-focused equity fund;
- seek investment diversification through exposure to Emerging Market Countries equities;
- have a high level of risk tolerance commensurate with an investment in developing countries;
- seek an investment that promotes environmental and social characteristics;
- can tolerate frequent periods of high volatility and risk;
- have a long-term investment horizon.

## Sustainable Global Equity Income

The Sustainable Global Equity Income Portfolio aims to achieve income combined with capital appreciation and seeks to address the sustainability challenges facing people and the environment by investing in companies that provide solutions aligned with the Portfolio's Sustainability Themes: Energy Transition, Resource Efficiency, Sustainable Infrastructure, Sustainable Finance, Societal Development, Health & Wellbeing, Technological Inclusion & Innovation.

The Portfolio invests at least 90% of its assets in a concentrated portfolio of shares of companies which may be located anywhere in the world, be of any size and from any industry or economic sector, subject to the Portfolio's sustainable investment criteria and the Investment Manager's "Avoid, Invest, Improve" philosophy as described in the SFDR RTS Annex of this Prospectus. The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI ACWI Index and looks to outperform the index over rolling 5-year periods, after the deduction of charges. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is used for the purposes above and is not intended to be aligned with or used to attain the sustainable investment objective of the Portfolio.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and as a result of its sustainable investment objective, the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Sustainable Investment Objective**

The Portfolio is considered to be within the scope of Article 9 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR") as it has a sustainable investment objective.

Please refer to the General Sustainability Disclosures Appendix in this Prospectus for further information.

Information about the sustainable investment objective of the Portfolio is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek income and capital appreciation;
- seek to add diversification to their investments through exposure to global equities;
- seek an investment that has a sustainable investment objective;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## Global Select

The Global Select Portfolio seeks to achieve capital appreciation by investing principally in equity securities issued by companies globally. The "select" investment approach means that the Portfolio has the flexibility to take significant stock and sector positions, which may lead to increased levels of volatility.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI ACWI Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek above average capital growth;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- seek an investment that promotes environmental and social characteristics;
- can tolerate high volatility in the value of their investment;
- have a long-term investment horizon.

## Global Smaller Companies

The Global Smaller Companies Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of Global Smaller Companies. The Portfolio may further invest in other securities (including fixed income securities and other equities).

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI World Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment diversification through exposure to global equities;
- seek investment exposure to small size companies. The investor should be aware that there are certain risks associated with investing in smaller companies that may include greater market price volatility and greater vulnerability to fluctuations in the economic cycle;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## American

The American Portfolio seeks to achieve capital appreciation. It looks to outperform the S&P 500 Index after the deduction of charges.

The Portfolio is actively managed and invests principally in shares of companies domiciled in the US or which have significant US business operations. The Portfolio may further invest in other securities (including fixed income securities and other equities).

The Portfolio may use financial derivative instruments for hedging purposes.

The Portfolio selects companies considered to have good prospects for share price growth, from any industry or economic sector, and whilst there is no restriction on size, investment tends to focus on larger companies, such as those included in the S&P 500 Index.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the S&P 500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment diversification through exposure to the North American equity market. The investor should be aware that geographic concentration may add more volatility than a more geographically diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## American Select

The American Select Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of companies domiciled in North America or which have significant North American operations. These may include large, medium and smaller companies. There will be no particular specialisation. The select investment approach means that the Portfolio has the flexibility to take significant stock and sector positions which may lead to increased levels of volatility.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the S&P 500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the North American equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## American Smaller Companies

The American Smaller Companies Portfolio seeks to achieve capital appreciation by investing principally in shares issued by American Smaller Companies that are domiciled in the United States or have significant US operations.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the Russell 2500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment diversification through exposure to the US equity market. The investor should be aware that geographic concentration may add more volatility than a more geographically diversified portfolio;
- seek investment exposure to small size companies. The investor should be aware that there are certain risks associated with investing in smaller companies that may include greater market price volatility and greater vulnerability to fluctuations in the economic cycle;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## Asia Equities

The Asia Equities Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of companies domiciled in the Asia Pacific region (excluding Japan), or with significant operations in Asia Pacific (excluding Japan), including through depositary receipts. The Portfolio may invest up to 40% of its Net Asset Value in China A-Shares through the China-Hong Kong Stock Connect Programme.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI AC Asia Pacific ex Japan Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the Asia Pacific equity market, excluding Japan. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## US Contrarian Core Equities

The US Contrarian Core Equities Portfolio seeks to achieve long-term capital appreciation by investing principally in the equity securities of large cap companies (generally over US$ 2 billion in market capitalisation, as at time of purchase) listed, domiciled, or conducting a significant part of their business in the United States. The Investment Manager will take a contrarian approach and will specifically target stocks that it believes are undervalued by the market.

The Portfolio may use financial derivative instruments for investment purposes, hedging and efficient portfolio management. These derivatives may include but are not limited to equity swaps, options, futures and foreign currency exchange contracts.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the S&P 500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the US equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment time horizon.

## US Disciplined Core Equities

The US Disciplined Core Equities Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of large cap companies (within the market capitalisation range of companies in the S&P 500 Index, as at the time of purchase) listed, domiciled or exercising a predominant part of their activity in the United States.

Secondarily, the Portfolio may also invest in the equity securities of companies listed, domiciled and exercising a predominant part of their activity outside the United States.

The Investment Manager aims to use a consistent, disciplined investment approach to select securities, by combining quantitative and fundamental research based on multiple sector-specific factors. The Investment Manager selects potential investments using a fundamental, research-based approach and incorporates this research into proprietary models which seek to identify undervalued companies with improving fundamentals, and to generate model rankings for individual companies. The model rankings are used by the Investment Manager to select securities and construct the Portfolio based on the Investment Manager's expertise and fundamental knowledge of the securities.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the S&P 500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the US equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment time horizon.

## Pan European Equities

The Pan European Equities Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of large companies domiciled in Europe or with significant European activities. The Portfolio may further invest in the equity securities of European Smaller Companies and Money Market Instruments.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Europe Index. The index is broadly representative of the companies in which the Portfolio invests and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index. Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the European equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## Pan European Focus

The Pan European Focus Portfolio seeks to achieve capital appreciation. The Portfolio is actively managed and invests at least 75% of its assets in a concentrated portfolio of shares of companies domiciled in Europe (including the UK), or which have significant business operations there.

The Portfolio selects companies in which the Investment Manager has a high conviction that the current share price does not reflect the prospects for that business. These companies may be chosen from any industry or economic sector, with significant sector and share weightings taken at the Investment Manager's discretion. There is no restriction on company size, however, investment tends to focus on larger companies, such as those included in the MSCI Europe Index.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio may use financial derivative instruments for hedging purposes.

The Portfolio is actively managed in reference to the MSCI Europe Index and looks to outperform the index over rolling 3-year periods, after the deduction of charges. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index. Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

The Portfolio typically invests in fewer than 50 companies, which may include shares of some companies not within the Index.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the European equity market. The investor should be aware that geographic, stock or sector concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## Pan European Small Cap Opportunities

The Pan European Small Cap Opportunities Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of European Smaller Companies. The Portfolio may further invest in other securities (including fixed income securities and other equities).

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Europe Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the European equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek investment exposure to small size European companies. The investor should be aware that there are certain risks associated with investing in smaller companies that may include greater market price volatility and greater vulnerability to fluctuations in the economic cycle;
- can tolerate potentially large fluctuations in share price;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## Pan European Smaller Companies

The Pan European Smaller Companies Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of European Smaller Companies. The Investment Manager will typically favour investments in companies at the higher end of the smaller companies capitalisation scale.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Europe Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the European equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek investment exposure to small size European companies, with an inclination towards companies at the higher end of the smaller companies capitalisation scale. The investor should be aware that there are certain risks associated with investing in smaller companies that may include greater market price volatility and greater vulnerability to fluctuations in the economic cycle;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## European Select

The European Select Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of companies domiciled in Continental Europe or which have significant Continental European operations. These may include large, medium and smaller companies. There will be no particular specialisation. The select investment approach means that the Portfolio has the flexibility to take significant stock and sector positions which may lead to increased levels of volatility. The Portfolio may further invest in other securities (including fixed income securities and other equities).

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the FTSE World Europe ex UK Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to Continental European equity markets. The investor should be aware that geographic, stock or sector concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## European Smaller Companies

The European Smaller Companies Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of European smaller companies (excluding the United Kingdom). For this Portfolio, European smaller companies are companies, that at the time of purchase, are no larger by free-float adjusted market capitalisation[7] than the largest constituent of the MSCI Europe ex UK Small Cap Index.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Europe ex UK Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the European equity market, excluding the United Kingdom. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek investment exposure to small size European companies. The investor should be aware that there are certain risks associated with investing in smaller companies that may include greater market price volatility and greater vulnerability to fluctuations in the economic cycle;
- seek an investment that promotes environmental and social characteristics;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

[7] Market capitalisation refers to the total value of a company's shares. The free-float adjusted method of calculating market capitalisation includes only shares available for purchase in public equity markets so excludes, for example, shares held privately, by the company itself and its affiliates or by governments.

## Asian Equity Income

The Asian Equity Income Portfolio seeks to achieve income and capital appreciation by investing principally in the equity securities of companies domiciled in the Asia Pacific region (with the exclusion of Japan) or with significant Asia Pacific (excluding Japan) operations. The Portfolio may further invest in other securities (including fixed income securities, other equities, convertible debt securities and real estate investment trusts).

The Portfolio may invest up to 40% of its Net Asset Value in China A-Shares through the China-Hong Kong Stock Connect Programme.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI AC Asia Pacific ex Japan Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek income and capital appreciation;
- seek investment exposure to the Asia Pacific (excluding Japan) equity market. The investor should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities of a single region;
- have a long-term investment horizon.

## Global Technology

The Global Technology Portfolio seeks to achieve long term capital appreciation by investing principally in the equity securities of companies with business operations in technology and technology-related industries globally. Technology-related companies are those companies that use technology extensively to improve their business processes and applications.

The Portfolio may invest in Transferable Securities of issuers of any size and domiciled in any country. The Portfolio will normally invest its assets in common stock, however it may invest in other types of equity securities, including securities convertible or exchangeable into common stock, rights and warrants to purchase common stock and depositary receipts representing an ownership interest in these equity securities. The Portfolio may invest up to 25% of its assets in preferred stock and Investment Grade debt securities.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI World Information Technology 10/40 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek portfolio diversification through exposure to the technology sector. The investor should be aware that sector concentration may add more volatility than a more broadly diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## UK Equities

The UK Equities Portfolio seeks to achieve capital appreciation by investing principally in the equity securities of companies domiciled in the United Kingdom or which have significant United Kingdom operations. The Portfolio may further invest in other securities (including fixed income securities and other equities).

The Portfolio may use financial derivative instruments for the purpose of reducing risks or costs, i.e. where the use of a financial derivative instrument is economically appropriate.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the FTSE All-Share Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the equity market of the United Kingdom. The investor should be aware that geographic concentration may add more volatility than a more geographically diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long-term investment horizon.

## UK Equity Income

The objective of the UK Equity Income Portfolio is to achieve an income at least in line with the equity market of the United Kingdom combined with sound prospects for capital growth.

The Portfolio will principally invest in the equity securities of companies domiciled in the United Kingdom or exercising a predominant part of their activity in the United Kingdom.

The Portfolio may further invest in other securities (including fixed income securities and other equities).

The Portfolio may use financial derivative instruments for the purpose of reducing risks or costs, i.e. where the use of a financial derivative instrument is economically appropriate.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the FTSE All-Share Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- primarily seek income as well as capital appreciation;
- seek investment exposure to the equity market of the United Kingdom. The investor should be aware that geographic concentration may add more volatility than a more geographically diversified portfolio;
- can tolerate potentially high volatility in the value of their investment;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- have a long term investment time horizon.

## Japan Equities

The Japan Equities Portfolio seeks to achieve capital appreciation by investing a minimum of 80% of its net assets in a concentrated portfolio of equity securities issued by companies domiciled in Japan, or with significant Japanese activities, including through depositary receipts.

The Portfolio may also invest in the equity securities of companies domiciled outside Japan, or without significant Japanese activities, including through depositary receipts. The Portfolio may also invest up to a maximum of 10% of its net assets in other UCIs.

The Portfolio may use financial derivative instruments for hedging purposes.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI Japan Index and looks to outperform the index over rolling 3-year periods, after the deduction of charges. The index is broadly representative of the companies in which the Portfolio invests and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics.

The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index. Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek investment exposure to the Japanese equity market. Investors should be aware that geographic concentration may add more volatility than a more broadly diversified portfolio;
- seek an investment that promotes environmental and social characteristics;
- have a high level of risk tolerance commensurate with an investment in equity securities;
- can tolerate potentially high volatility in the value of their investment;
- have a long-term investment horizon.

THE ABSOLUTE RETURN PORTFOLIOS:

RISK FACTORS FOR ABSOLUTE RETURN PORTFOLIOS (TO BE READ IN CONJUNCTION WITH THE "RISK FACTORS" SECTION OF THIS PROSPECTUS):

**Absolute Return**

Portfolios seeking an Absolute Return will use investment techniques that are capable of making profits in markets where security prices are increasing or decreasing. As such, they have a potential to deliver a positive return independent of the market direction. However, it is important to note this does not mean these Portfolios will produce a positive return at all times, and indeed may be subject to periods of negative return. These investment techniques will also introduce additional risks when compared to more traditional directional Portfolios.

**Use of derivatives and forward transactions**

The Portfolios use derivatives and forward transactions for both efficient portfolio management and investment purposes including short selling and leverage. The use of derivatives and forward transactions may significantly increase or decrease the risk profile of the Portfolio.

**Short Sales and Leverage**

The Portfolio's exposure involves short sales of securities and leverage via financial derivative instruments which increases the risk of the Portfolio. The investment strategy includes the synthetic short sales of securities, which creates an exposure equivalent to selling securities not physically owned by the Portfolios at the time. The Portfolios will profit if the value of these securities fall, however, if the value of these securities increase, it will have a negative impact on the Portfolios. The use of derivatives may also create leverage in the Portfolios. Leverage has the effect of increasing the magnitude of any profits compared to if there were no leverage. However, it will also increase the level of any loss.

For the avoidance of doubt, the Absolute Return Portfolios do not offer any form of guarantee with respect to performance, and no form of capital protection will apply.

**For further information on risks associated to the use of derivatives, please note section "Use of Derivatives and other Investment Techniques" in the "Risk Factors" section.**

## Credit Opportunities

The Credit Opportunities Portfolio is actively managed and seeks to achieve an absolute return from income and capital appreciation by investing principally, either directly or indirectly through derivatives or UCIs, in global government bonds, corporate bonds and other credit related instrument (including CoCos) that are either Investment Grade or below Investment Grade. The Portfolio may also invest in bonds that are unrated. Not more than 10% of the Portfolio's net assets may be invested in UCIs.

Secondarily, the Portfolio may also invest in other debt securities including, but not limited to, index linked securities, Money Market Instruments, and up to 20% of its net assets in asset-backed and/or mortgage-backed Transferable Securities. The Portfolio may invest up to 20% of its net assets in CoCos.

The Portfolio may take a significant exposure to high yield securities, including investment of up to 10% in securities rated CCC- or lower by S&P or Fitch Ratings, Inc., or Caa3 or lower by Moody's. In relation to securities held directly, the credit rating will be determined by the Basel rating i.e., the median rating (the lowest of the two highest ratings available from the three main rating agencies, Fitch Ratings Inc., Moody's and S&P). If only two of the three main rating agencies have an available long-term credit rating then the lower of the two available ratings will apply. If only one of the three main rating agencies has an available long term credit rating, then that rating will apply. The weighted average credit rating is expected to be a minimum of B as rated by S&P or Fitch or the Moody's equivalent of B2.

Certain positions will be taken by the use of financial derivative instruments including, but not limited to, swaps (incl. total return swaps as described below), forward positions, futures and options related to the instruments above in accordance with section A(7)(i) in Appendix A "Investment Restrictions".

The Portfolio may take long and short positions to achieve its investment objective.

The Portfolio may enter into total return swaps (a general description of total / excess return swaps is available in Appendix B.I) on high yield instruments or cash credit indices for hedging and / or investment purposes, to gain market exposure and liquidity or as part of a leveraged long strategy. For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

Any of the assets of the Portfolio may be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value**[8] | **Expected proportion of Net Asset Value**[9] |
|---|---|---|
| Total return swaps | 100% | 25% |

The Portfolio will use financial derivative instruments and forward transactions for hedging and investment purposes, which may increase or decrease the risk profile of the Portfolio.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is not managed in reference to a benchmark. The Compounded euro short-term rate (€STR) average rate, 1 month tenor is used as a point of comparison against which Portfolio performance may be measured and evaluated over time.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek returns from both income and capital appreciation;
- have a moderate risk tolerance and are prepared to tolerate some price fluctuations;
- have a medium-term investment time horizon.

[8] The proportion is determined on the basis of the Sum of Notionals approach.
[9] The proportion is determined on the basis of the Sum of Notionals approach.

## Pan European Absolute Alpha

The Pan European Absolute Alpha Portfolio is actively managed and seeks to achieve an absolute return. The Portfolio will principally invest, either directly, or indirectly through financial derivative instruments, in a portfolio of equity securities of companies domiciled in Europe or exercising a predominant part of their activity in Europe.

The Portfolio may invest up to one third of its assets, either directly, or indirectly through financial derivative instruments, in equity securities of companies domiciled outside Europe. The Portfolio may also hold cash and Money Market Instruments.

The Portfolio pursues a long-short equity strategy. The Portfolio will therefore take long exposures, either directly or indirectly through financial derivative instruments and short exposures, solely through the use of financial derivative instruments, to publicly traded equity securities, exchange-traded funds or equity indices.

The financial derivative instruments that may be used by the Portfolio include mainly total return swaps and futures, the underlying of which may be publicly traded equity securities, exchange-traded funds or equity indices, in accordance with section A(7)(i) in Appendix A "Investment Restrictions".

It is expected that the Investment Manager will obtain part of its long and short exposure by investing in a single total return swap entered into with a counterparty, where the return is linked to the performance of a portfolio of actively managed investments. These investments will consist mainly of equity-related securities, exchange-traded funds and equity index positions and will be selected by the Investment Manager at its sole and entire discretion.

For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

It is expected that the assets mentioned above will be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value**[10] | **Expected proportion of Net Asset Value**[11] |
|---|---|---|
| Total return swaps | 100% | 50% |

Investors should note that financial derivative instruments will be used for both efficient portfolio management and investment purposes, which may increase or decrease the risk profile of the Portfolios.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

For the purposes of calculating the performance fee, the Portfolio references the 3 month Euro Interbank Offered Rate (EURIBOR). This benchmark is also used as a point of comparison against which Portfolio performance may be measured and evaluated over time.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek returns driven principally by long and short investment decisions;
- have a high risk tolerance;
- have a long term investment time horizon.

[10] The proportion is determined on the basis of the Sum of Notionals approach.
[11] The proportion is determined on the basis of the Sum of Notionals approach.

THE EXTENDED ALPHA PORTFOLIOS:

RISK FACTORS FOR EXTENDED ALPHA PORTFOLIOS (TO BE READ IN CONJUNCTION WITH THE "RISK FACTORS" SECTION OF THIS PROSPECTUS):

**Extended Alpha**

The Extended Alpha Portfolios will use an equity extension strategy which uses the proceeds from short sales to extend (*i.e.* increase) the Portfolios' long positions. This technique provides the Investment Manager with the potential to generate additional alpha. Alpha means the excess return generated by the Investment Manager over the performance of an index considered to represent the market as a whole.

**Use of derivatives and forward transactions**

The Portfolios use derivatives and forward transactions for both efficient portfolio management and investment purposes including short selling and leverage. The use of derivatives and forward transactions may significantly increase or decrease the risk profile of the Portfolio.

**Short Sales and Leverage**

The Portfolio's exposure involves short sales of securities and leverage via financial derivative instruments which increases the risk of the Portfolio. The investment strategy includes the synthetic short sales of securities, which creates an exposure equivalent to selling securities not physically owned by the Portfolios at the time. The Portfolios will profit if the value of these securities fall, however, if the value of these securities increase, it will have a negative impact on the Portfolios. The use of derivatives may also create leverage in the Portfolios. Leverage has the effect of increasing the magnitude of any profits compared to if there were no leverage. However, it will also increase the level of any loss.

**For further information on risks associated to the use of derivatives, please note section "Use of Derivatives and other Investment Techniques" in the "Risk Factors" section.**

## American Extended Alpha

The American Extended Alpha Portfolio seeks to achieve capital appreciation.

The Portfolio will principally invest directly or indirectly in equity securities of companies domiciled in North America or which have significant North American operations.

The Portfolio may secondarily invest in markets other than in North America.

The Portfolio's exposure to any of these markets may be gained through both long and short positions.

The Portfolio may invest in equities, derivatives, forward transactions and UCIs. The Portfolio may also hold cash, deposits and Money Market Instruments.

The Portfolio will invest in derivatives to gain short exposure and may also invest in derivatives to gain long exposure.

The Investment Manager may choose to use one or a combination of the above investment methods. It is however expected that the Investment Manager will obtain its short exposure by investing in a single total return swap entered into with a counterparty where the return is linked to the economic performance of a reference portfolio of an actively managed portfolio of investments. These investments will principally consist of equity-related securities, exchange-traded funds and equity index positions and will be selected by the Investment Manager at its sole and entire discretion.

For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

It is expected that the assets of the Portfolio will be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value**[12] | **Expected proportion of Net Asset Value**[13] |
|---|---|---|
| Total return swaps | 100% | 50% |

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the S&P 500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek above average capital appreciation;
- have a high-risk tolerance and are prepared to tolerate large price fluctuations;
- have a long term investment time horizon.

[12] The proportion is determined on the basis of the Sum of Notionals approach.
[13] The proportion is determined on the basis of the Sum of Notionals approach.

## Global Extended Alpha

The Global Extended Alpha Portfolio seeks to achieve capital appreciation.

The Portfolio will principally invest directly or indirectly into equity securities worldwide, including shares of companies in developed countries and Emerging Market Countries. Exposure to these markets may be gained through both long and short positions.

The Portfolio may invest in equities, including through depositary receipts, derivatives, forward transactions and eligible UCIs. The Portfolio may also hold cash, deposits and Money Market Instruments.

The Portfolio will invest in derivatives to gain short exposure and may also invest in derivatives to gain long exposure.

The Investment Manager may choose to use one or a combination of the above investment methods. It is however expected that the Investment Manager will obtain part of its long and short exposure by investing in a single total return swap entered into with a counterparty, where the return is linked to the performance of a portfolio of actively managed investments. These investments will consist mainly of equity-related securities, exchange-traded funds and equity index positions and will be selected by the Investment Manager at its sole and entire discretion.

For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

It is expected that the assets of the Portfolio will be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value** [14] | **Expected proportion of Net Asset Value** [15] |
|---|---|---|
| Total return swaps | 100% | 50% |

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the MSCI ACWI Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- have a high-risk tolerance and are prepared to tolerate large price fluctuations;
- have a long term investment time horizon.

[14] The proportion is determined on the basis of the Sum of Notionals approach.
[15] The proportion is determined on the basis of the Sum of Notionals approach.

## Global Real Estate Securities

The Global Real Estate Securities Portfolio seeks to achieve capital appreciation. It looks to outperform the FTSE EPRA Nareit Developed NR Index over rolling 3-year periods, after the deduction of charges.

The Portfolio will principally invest directly or indirectly into equity securities of listed real estate companies, including closed-ended REITs, located in developed countries.

The Portfolio may further invest in other equity securities, Investment Grade bonds, convertible bonds, derivatives, forward transactions and UCIs. Up to 10% of the Portfolio's assets may be invested in securities from companies located in Emerging Market Countries.

The Portfolio will seek to achieve its index outperformance by identifying relative value pair and peer group trade opportunities across the globe. The Portfolio will invest in broadly the same geographical regions, and in broadly the same geographical regional exposure as the index, whilst not being constrained to invest only in the companies included in the index.

The Portfolio's exposure to any of these markets may be gained through both long and short positions. The Portfolio will invest in derivatives to gain short exposure and may also invest in derivatives to gain long exposure. The maximum permitted short exposure is -50% and the maximum permitted long exposure is +150%.

The Investment Manager may choose to use one or a combination of the above investment methods. It is however expected that the Investment Manager will obtain its short exposure by investing in a single total return swap (which may also be referred to, interchangeably, as contract for difference and/or equity swap) entered into with a counterparty where the return is linked to the economic performance of a reference portfolio of an actively managed portfolio of investments. These investments will principally consist of equity-related securities and equity index positions and will be selected by the Investment Manager at its sole and entire discretion.

For further information on counterparties, please refer to Appendix B.I of the Prospectus and to the SICAV's annual report.

It is expected that the assets of the Portfolio will be subject to total return swaps under the following proportions:

| | **Maximum proportion of Net Asset Value**[16] | **Expected proportion of Net Asset Value**[17] |
|---|---|---|
| Total return swaps | +100% Long<br>-50% Short | +35% Long<br>-30% Short |

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the FTSE EPRA Nareit Developed NR Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Promotion of Environmental and Social Characteristics**

The Investment Manager promotes environmental and social characteristics by integrating a range of responsible investment measures into the investment decision-making process, as well as ensuring that the companies in which the Portfolio invests follow good governance practices.

[16] The proportion is determined on the basis of the Sum of Notionals approach.
[17] The proportion is determined on the basis of the Sum of Notionals approach.

Information about the environmental or social characteristics promoted by the Portfolio and their integration into the investment process is available in the SFDR RTS Annex of this Prospectus.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek diversified exposure to the global real estate sector;
- seek an investment that promotes environmental and social characteristics;
- have a high-risk tolerance and are prepared to tolerate large price fluctuations;
- have a long term investment time horizon.

THE SPECIALIST PORTFOLIO:

## Enhanced Commodities

The Enhanced Commodities Portfolio seeks to achieve capital appreciation which is directly and indirectly linked to commodity markets.

The Portfolio is actively managed and will invest in financial derivative instruments (including total return swaps) whose underlying instruments are diversified commodity indices composed of futures contracts on physical commodities.

To create under and overweight positions relative to the reference portfolio in individual commodities and commodity sectors, it is intended to use a combination of long and short positions in diversified commodity indices. The long and short positions will largely offset one another and provide the Investment Manager the ability to adjust weights and position on the curve consistent with the Portfolio's investment strategy. The long and short positions will result in creating leverage on a Sum of Notionals basis, but on a net basis the Portfolio will continue to be fully invested in commodities and will not be leveraged to the market. Additionally, the Portfolio will not actively be exposed to any net short commodity positions. The expected level of leverage determined on the Sum of Notionals basis would likely average 0-400% and is not expected to exceed 700%. A degree of leverage on a Sum of Notionals basis can be attributed to transactions related to the hedged Classes of the Portfolio. The Portfolio will report global exposure on a relative VaR basis. The relative VaR limit will be 30% more than the VaR of the reference benchmark of the Portfolio.

The Portfolio will invest collateral in investment grade government debt with maturities less than one year.

The Portfolio may also invest in exchange traded funds and securitised notes, certificates, Investment Grade government securities, Money Market Instruments, cash, and/or other debt securities.

The Portfolio will use financial derivative instruments for investment purposes, hedging and efficient portfolio management.

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), as described under "Investment Restrictions" in Appendix A.

Subject to the limits described under "Investment Restrictions" in Appendix A, the Portfolio may also hold bank deposits (other than bank deposits at sight), Money Market Instruments or money market funds for treasury purposes and in case of unfavourable market conditions. In normal market conditions, investments in these assets or instruments will not exceed 10% of the Portfolio's Net Asset Value.

The Portfolio is actively managed in reference to the Bloomberg Commodity Index. The index is broadly representative of the assets in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the Investment Manager's risk monitoring process.

**Use of total return swaps:**

The Portfolio enters into total/excess return swaps (a general description of total/excess return swaps is available in Appendix B.I) on diversified commodity indices for investment purposes. These total/excess return swaps allow the Portfolio to gain exposure to commodity markets as futures and options on commodities are not available to the Portfolio.

It is expected that the net exposure of the total/excess swaps will be consistent with the NAV of the Portfolio as the Portfolio is fully exposed to commodities:

| | **Maximum proportion of Net Asset Value**[18] | **Expected proportion of Net Asset Value**[19] |
|---|---|---|
| Total/Excess return swaps | 700% | 400% |

[18] The proportion is determined on the basis of the Sum of Notionals approach.
[19] The proportion is determined on the basis of the Sum of Notionals approach.

The Investment Manager regularly resets the total return swap positions, following which exposure is expected to be close to the expected proportion of Net Asset Value. In between such resets, the exposure is likely to be closer to the maximum proportion of Net Asset Value, as the Investment Manager adjusts exposure to individual commodities by entering into additional total return swap transactions.

**Typical Investor's Profile**

This Portfolio is suitable for investors who:

- seek capital appreciation;
- seek portfolio diversification within their investment through exposure to commodities;
- have a high risk tolerance;
- can tolerate potentially high volatility in value of their investment;
- have a long term investment time horizon.

Investors should note the "Risk factors" section of this Prospectus in terms of risks applicable to investing in the Enhanced Commodities Portfolio and in particular "Use of Derivatives and other investment Techniques", "Counterparty Risk", "Financial derivatives on indices or sub-indices", "Total/Excess Return Swaps", "Commodity Indexes" and "Exchange traded notes". Investors should consider this extra risk when evaluating the potential benefits of investing in this Portfolio.

The Portfolio uses derivatives to gain exposure to commodity indices or sub-indices composed of futures contracts on physical commodities. The use of such derivatives for investment purposes may increase the risk profile of the Portfolio.

## OTHER INVESTMENT PRACTICES

(1) The Global Dynamic Real Return Portfolio, the Equity Portfolios and certain Bond Portfolios may invest in warrants to purchase common stock. Investment in warrants entails special risks, notably those described under "Investment in warrants" in the "Risk Factors" section below.

(2) Each Portfolio may hold up to 20% of its total net assets in ancillary liquid assets (i.e. bank deposits at sight) which are held in order to cover current or exceptional payments (such as redemptions or to meet other liquidity needs), or for the period of time necessary to reinvest in eligible assets provided under article 41(1) of the Law of 2010 or for a period of time strictly necessary in case of unfavourable market conditions. Such restriction may temporarily be exceeded for a period of time strictly necessary in case of exceptionally unfavourable market conditions if the SICAV considers this to be in the best interest of the Shareholders.

(3) Unless otherwise specified within the Portfolio's investment objective and policy, each Portfolio may invest up to 10% of its net assets in units of other UCIs or UCITS. See Section C(a)(12) of Appendix A below. Investors are thus subject to the risk of duplication of fees and commissions except that if a Portfolio invests in other UCIs or UCITS sponsored by Ameriprise Financial, Inc. or one of its affiliates or by a company with which Ameriprise Financial, Inc. is bound within the framework of a community of management or of control or by a direct or indirect shareholding of more than 10% of the share capital or of the votes, the Portfolio will not be charged any subscription and redemption fees with respect to such investment and any of the Asset Management Fee with respect to such assets. The maximum management fees of other UCIs or UCITS in which a Portfolio may invest shall not exceed 2.5% of such Portfolio's assets.

(4) When market or financial conditions warrant, and in accordance with the Investment Restrictions in Appendix A, each Portfolio may invest, as a temporary defensive measure, up to 100% of its net assets in transferable debt obligations issued or guaranteed in accordance with Investment Restriction C(a)(6) by a member state of the OECD or issued by public international bodies of which one or more Member States are members. In addition, for temporary purposes, each Portfolio may borrow from banks or other lending institutions in amounts up to 10% of its net assets. Such borrowing may be used for liquidity purposes (e.g., to cover cash shortfall caused by mismatched settlement dates on purchase and sale transactions, finance repurchases or pay fees reverting to a service provider) and/or for investment purposes. The assets of such Portfolio may be charged as security for any such borrowings in accordance with the principle of segregation of assets and liabilities provided by Article 181 of the 2010 Law.

(5) To determine the rating of an instrument with a split rating, the lower rating shall prevail.

(6) The Portfolios that invest in US Bonds may purchase restricted securities that are offered and sold only to "qualified institutional buyers" under Rule 144A of the US Securities Act of 1933.

(7) Each Portfolio's ability to purchase or sell portfolio securities may be affected by laws or regulations relating to the convertibility and repatriation of assets. Because the Shares of each Portfolio may be redeemed on each Valuation Date in the currency which has been elected at the time of subscription, the Management Company and the relevant Investment Manager intend to manage each Portfolio so that they will be able to obtain the liquidity necessary to meet anticipated redemptions. There can be no guarantee that this result will be achieved.

(8) Except as otherwise noted below, each Portfolio may use financial derivative instruments (including options, forwards, futures, contracts for difference and/or swaps (including credit default swaps, credit default swaps on eligible loan indices, interest rate swaps and, to the extent permitted by the relevant Portfolio's investment policy, total/excess return swaps) on Transferable Securities and/or any financial instruments and currencies) to hedge against market and currency risks, as well as for efficient portfolio management, as described under "Investment Restrictions" in Appendix A and "Investment Techniques and Instruments" in Appendix B. Certain Portfolios may further use financial derivative instruments as a principal investment objective, as more fully described in the investment policy of each relevant Portfolio, when appropriate. In such case, the underlying of the financial derivative instruments must consist in instruments in which the Portfolio may invest according to its investment policy. Shareholders should be aware that the use of derivative instruments for purposes other than hedging carries a certain degree of risk.

If a Portfolio invests in OTC derivatives, such Portfolio may hold material quantities of cash, time deposit and/or Money Market Instruments with a remaining maturity not in excess of 12 months. These additional cash levels will not be held in direct pursuit of achieving the investment objectives of the relevant Portfolio, but may be required as a consequence of the use of the OTC derivatives for risk management purposes, notably in order to cover for exposure to such derivatives or mitigate the risk of the leverage entailed by the use of the derivatives.

In the context of OTC financial transactions and efficient portfolio management techniques, Portfolios may receive or post collateral. The Portfolios collateralise 100% of exposure to OTC derivatives (except for physically settled FX forwards and physically settled FX swaps) subject to minimum transfer amounts ranging from 100,000 to 250,000 of the Base Currency of the relevant Portfolio, varying by counterparty. Collateral shall:

- comply with the ESMA Guidelines and, amongst others, fulfil the criteria set out therein in terms of (a) liquidity, (b) valuation, (c) issuer credit quality, (d) correlation, (e) diversification, (f) risk, (g) holding, (h) enforcement, (i) non-cash-collateral, (j) cash-collateral; and
- be managed in compliance with the following policy:
    - o eligible collateral is cash, typically GBP, USD or Euros, or Investment Grade fixed income Transferable Securities issued by Government entities. The Portfolios will not post or receive non-Government issues or equity securities as collateral;
    - o haircuts are applied as determined by the agreement with the counterparty to the transaction to account for liquidity and price volatility, and typically have the levels described in the table below:

<table>
<tr><th colspan="3">Eligible Collateral</th><th>Haircut Level</th></tr>
<tr><td colspan="3">Investment Grade fixed income Transferable Securities issued by Government entities*</td><td></td></tr>
<tr><td></td><td><u>Issue rating</u></td><td><u>Residual Maturity</u></td><td></td></tr>
<tr><td rowspan="4"></td><td rowspan="4">n/a<br>or<br>at least AA- (S&P) / Aa3 (Moody’s)**</td><td>< 1 year</td><td>0-2%**</td></tr>
<tr><td>> 1 year < 5 years</td><td>2-3%**</td></tr>
<tr><td>> 5 years < 10 years</td><td>3-5%**</td></tr>
<tr><td>> 10 years < 30 years</td><td>5-6%**</td></tr>
<tr><td colspan="3">Cash in the Base Currency of the Portfolio</td><td>0%</td></tr>
<tr><td colspan="3">Cash in currency other than the Base Currency of the Portfolio</td><td>0%</td></tr>
<tr><td colspan="4">* In practice, these are only U.S. Treasury Securities from different issues, which are negotiable, registered debt obligations issued by the U.S. Treasury Department but excluding principal only and interest only Treasury strips.</td></tr>
<tr><td colspan="4">**Depending on the counterparty.</td></tr>
</table>

    - o the Portfolios will not reinvest collateral received and counterparties are not permitted to reinvest collateral posted by the Portfolios.

Collateral will be valued on a daily basis, using available market prices and taking into account the applicable haircut. Investment Grade fixed income Transferable Securities issued by Government entities are generally valued at bid price since this is the price that would be obtained if the Portfolio were to sell the securities following a counterparty default. However, mid-market prices may be used where this is the market practice for the relevant transaction. Variation margin is generally transferred on a daily basis in respect of any net exposure between a Portfolio and the relevant counterparty subject to applicable minimum transfer amounts.

Currently, all collateral received is safe kept with the SICAV’s depositary.

(9) Portfolios allowed to invest in financial indices shall ensure that their target indices comply with applicable laws and regulations. In this respect and amongst others, a Portfolio should not invest in a financial index, the components of which are ineligible assets under UCITS rules, where:

- it has a single component that has an impact on the overall index return which exceeds 35%, or more than one component which exceeds 20%; a Portfolio intending to invest in commodity indices will not invest in commodity indices that do not consist of different commodities;
- it does not satisfy the index criteria in Article 53 of the UCITS Directive and Article 9 of Directive 2007/16/EC of the European Commission implementing Council Directive 85/611/EEC on the coordination of laws, regulations and administrative provisions relating to UCITS as regards the clarification of certain definitions, including that of being a benchmark for the market to which it refers;
- the full calculation methodology to, inter alia, enable Shareholders to replicate the financial index is not disclosed by the index provider;
- it does not publish its constituents together with its respective weightings;
- the methodology for the selection and the rebalancing of the components is not based on a set of pre-determined rules and objective criteria;
- the index provider accepts payments from potential index components for inclusion in the index;
- the methodology permits retrospective changes to previously published index values (‘backfilling’);
- the index is not subject to independent valuation.

# RISK FACTORS

## General

Investment in any Portfolio entails a degree of risk. While there are some risks that may be common to a number or all of the Portfolios, there may also be specific risk considerations which apply to particular Portfolios in which case such risks will be specified in the investment policy section for that Portfolio. It is important to keep in mind one of the main principles of investing: the higher the risk of losing money, the higher the potential reward. The reverse, also, is generally true: the lower the risk, the lower the potential reward. Investment in the Shares may not be suitable for all investors and should not be considered a complete investment program.

The Net Asset Value of Shares can go down as well as up, and Shareholders may lose money by investing in a Portfolio. Shareholders should generally view an investment in a Portfolio as being a medium to long-term investment. The value of an investment in a Portfolio changes with the values of that Portfolio's investments. Many factors can affect those values. Each separate security in which a Portfolio may invest and the investment techniques which a Portfolio may employ are subject to various risks. The following describes some of the general risk factors that should be considered before investing in a particular Portfolio. The following list is neither specific nor exhaustive and a financial adviser or other appropriate professional should be consulted for additional advice.

**Market Risk.** A Portfolio may incur losses due to declines in the value of one or more securities in which it invests. These declines may be due to factors affecting a particular issuer, or the result of, among other things, political, regulatory, market, economic or social developments affecting the relevant market(s) more generally. In addition, turbulence and reduced liquidity in financial markets may negatively affect many issuers, which could adversely affect a Portfolio's ability to price certain assets in thinly traded and closed markets, and could also lead to significant redemptions and operational challenges. Global economies and financial markets are increasingly interconnected, and conditions and events in one country, region or financial market may adversely impact issuers in a different country, region or financial market. These risks may be magnified if certain events or developments adversely interrupt the global supply chain; in these and other circumstances, such risks might affect companies worldwide. As a result, local, regional or global events such as terrorism, civil conflicts and war, natural disasters, disease/virus outbreaks and epidemics or other public health issues, recessions, depressions or other events – or the potential for such events – could have a significant negative impact on global economic and market conditions. These and other related events could have a negative impact on Portfolio performance and the value of an investment in the Portfolio.

**Russia - Ukraine**. The large-scale invasion of Ukraine by Russia in February 2022 has resulted in sanctions and market disruptions, including volatility in regional and global stock and commodities markets and significant devaluations of Russian currency. The extent and duration of the military action are impossible to predict but could be significant. Market disruption caused by the Russian military action, and any counter measures or responses thereto (including international sanctions, a downgrade in the country's credit rating, purchasing and financing restrictions, boycotts, tariffs, changes in consumer or purchaser preferences, cyberattacks and espionage) could have a severe adverse impact on regional and/or global securities and commodities markets, including markets for oil and natural gas. These and other related events could have a negative impact on Portfolio performance and the value of an investment in the Portfolio.

## U.S. Banking Laws

Ameriprise Financial, Inc. ("**Ameriprise**"), the ultimate parent company of the Management Company, as a savings and loan holding company ("**SLHC**"), is subject to U.S. federal banking laws, including certain parts of the U.S. Bank Holding Company Act (which includes what is commonly referred to as the "**Volcker Rule**"), as well as the regulations of the Board of Governors of the Federal Reserve System. Among other things, this means Ameriprise, as an SLHC, and its affiliates are subject to certain restrictions on their investments and activities.

The Management Company does not believe that the SICAV is currently controlled by Ameriprise or one of its affiliates under the U.S. Bank Holding Company Act; however, the SICAV may be found to be controlled if certain circumstances change, such as if the level of proprietary investment by Ameriprise, its affiliates or other funds controlled by them reach certain levels after applicable seed periods. In that instance, the SICAV will be subject to certain limitations on investments in equity securities and interests in affiliated underlying funds. In particular, Ameriprise's aggregate investment in any non-financial equity security – including that of the SICAV and any other controlled funds or entities, combined – will be limited to less than 5% of the issuer's total voting shares outstanding.

In addition, under the Volcker Rule, a "banking entity," such as the Management Company, as well as Ameriprise and certain of its other affiliates, is generally restricted from acquiring or retaining, as principal, any ownership interest in, or sponsoring, a "covered fund," as defined by the Volcker Rule, unless the investment or activity is conducted in accordance with an exemption to the Volcker Rule. The Management Company expects that the SICAV will qualify for the foreign public fund exclusion from the definition of "covered fund" under the Volcker Rule, which imposes certain limitations on the ownership of SICAV shares by Ameriprise, the SICAV, affiliates of the SICAV and Ameriprise and certain directors and officers, among other requirements.

**Exchange Rates**

Many of the Portfolios are invested in securities denominated in a number of different currencies other than the Base Currency in which the Portfolios are denominated (or the currency of denomination of the particular Share Class) and, therefore, changes in foreign currency exchange rates will affect the value of securities in such Portfolios.

**Interest Rates**

The values of fixed income securities held by the Portfolios generally will vary inversely with changes in interest rates and such variation may affect Share prices accordingly.

**Inflation**

Inflation risk is the uncertainty over the future real value (after inflation) of an investment. Inflation rates may change due to shifts in the domestic or global economy, and a Portfolio's investments may not keep pace with inflation.

**Investment Style**

An investment style bias can impact a Portfolio's performance relative to its benchmark in a positive or negative way. No investment style performs well in all market conditions. When one style is in favour another may be out of favour. Such conditions may persist for short or long periods.

A Portfolio exhibits a growth style bias relative to its benchmark if the majority of the Portfolio invests in companies with above average growth rates, or good growth potential (based on indicators such as earnings and sales growth) relative to its benchmark. However, there is no guarantee that such companies will continue to show such characteristics in the future. A Portfolio's investment style may also change over time.

**ESG Investment Exclusions**

A Portfolio categorised under Article 8 or 9 of SFDR, excludes companies as part of the Investment Manager's investment decision-making process that are involved in certain industries and/or activities, or that breach certain minimum standards of conduct or governance. This reduces the investable universe and may impact the performance of the relevant Portfolio positively or negatively relative to a benchmark or other funds without such restrictions.

**High Yield**

Certain Portfolios may invest in High Yield (i.e. securities rated below investment grade). Investing in High Yield involves special risks in addition to the risks associated with investments in higher-rated fixed income securities. While offering a greater potential opportunity for capital appreciation and higher yields, High Yield typically entail greater potential price volatility and may be less liquid than higher rated securities. High Yield may be regarded as predominantly speculative with respect to the issuer's continuing ability to meet principal and interest payments. They may also be more susceptible to real or perceived adverse economic and competitive industry conditions than higher rated securities.

**Risk of downgrading in relation to High Yield securities**

Passive breaches of any limits that are set out in the investment policies of the Portfolios (for example, in the event that the credit ratings of securities are downgraded) will be treated in accordance with the requirement under the 2010 Law to "adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interests of its unit-holders". In most cases, passive breaches are resolved as soon as reasonably practicable (i.e. not immediately but timely), however where a delay is perceived to be necessary a reasonable timeframe will be agreed upon based on the circumstances and analysis of the facts at hand.

**Risk Factors Relating to Small and Mid-Cap Companies**

Some of the Portfolios invest in the securities of small and middle capitalised companies. There are certain risks associated with investing in securities of these types of companies, including greater market price volatility, less publicly available information, and greater vulnerability to fluctuations in the economic cycle. Because small and middle capitalised companies normally have fewer shares outstanding than larger companies, it may be more difficult to buy or sell significant amounts of such shares without affecting prevailing market prices.

**Hedged Share Classes**

Each Portfolio is denominated in a single Base Currency, which may be different from the currency in which a Shareholder's Shares are denominated.

The Shares available in a Portfolio may themselves be denominated either in the Base Currency or in another currency. Shares denominated in a currency other than the Base Currency may be either Hedged Shares or non-Hedged Shares:

- Hedged Shares are Shares which use currency derivatives (Please see the Risk warning on the Use of Derivatives and other Investment Techniques) in order to reduce (hedge) the risk incurred by the variation of the exchange rate between the Base Currency and the currency of denomination of the Hedged Shares.

- non-Hedged Shares, are Shares which do not provide any hedging against risk incurred by the variation of the exchange rate between the Base Currency and the currency of denomination of the Hedged Shares. Investors in such Shares will receive the return of the underlying investments in the Portfolio, bearing the risk associated with the currency movements between the Base Currency and the currency of denomination of the Shares they are invested in.

Investors should note that the Investment in a Portfolio through Hedged Shares incurs the following specific risks:

- there can be no guarantee that the hedging strategy applied in Hedged Shares will entirely eliminate the adverse effects of changes in exchange rates between the Base Currency and the currency of the relevant Hedged Shares.

- hedging transactions will be entered into whether or not the denomination currency of Hedged Shares is declining or increasing in value relative to the Base Currency. Consequently, while hedging may protect investors in the relevant Hedged Shares against a decrease in the value of the currency being hedged, it may also preclude these investors from benefiting from an increase in the value of such currency.

- Hedged Shares aim to reduce (hedge) only the exchange rate risk between the Base Currency and the currency of denomination of the Hedged Shares; no hedging is done between the currency of denomination of the Hedged Shares and the currencies of denomination of the Portfolio's investments. This means that:

    - where a Portfolio's investments are wholly or partially denominated in currencies other than the Base Currency, Hedged Shares will not protect their investors against changes in the exchange rates between the currencies of the Portfolio's investments and the currency of denomination of the Hedged Shares;

    - where a Portfolio holds assets denominated in the currency of the Hedged Shares, the exposure of an investor in Hedged Shares to that currency will be increased by comparison to the risk incurred by an investor holding shares denominated in another currency.

Gains or losses arising from currency hedging transactions are borne by the Shareholders of the respective Hedged Share Classes. However, due to the lack of segregation of liabilities between Share Classes, it cannot be excluded that, under certain circumstances, the settlement of currency hedging transactions or the requirement for collateral in relation to one Hedged Share Class could have an adverse impact on the net asset value of the other Share Classes in issue. For the avoidance of doubt, the fees associated with undertaking currency hedging services on Hedged Share Classes are separate and not included in the fixed Operating Expenses of the relevant Share Class.

**CNH Share Classes**

The official currency of the People's Republic of China, the renminbi, is traded on two markets, the first being onshore renminbi in mainland China ("**CNY**"), and the second being offshore renminbi outside mainland China ("**CNH**"). Shares whose second letter of denomination is 'R', are Shares whose Net Asset Value is denominated in CNH, i.e. offshore Chinese renminbi. CNY is not a freely convertible currency and is subject to exchange controls imposed by the government of the People's Republic of China. CNH may be traded more freely than CNY against other international currencies, and the exchange rate between CNH and such currencies is therefore determined by market forces. Shareholders should be aware that CNY and CNH will therefore have different exchange rates versus other currencies, and the value of CNH could potentially differ significantly from that of CNY due to a number of factors, including, but not limited to, exchange controls applied to CNY and market forces in place at any given time.

Shareholders should be aware that the availability of CNH Share Classes, and the conditions under which they may be available, are dependent on the political and regulatory policies of the People's Republic of China, and there can be no guarantee that CNH Share Classes will be offered in the future, and no guarantee as to the conditions under which they may be offered. Since the base currency of Portfolios offering CNH Share Classes will be a currency other than CNH, the ability of a Portfolio to make payments in CNH will depend on its ability to convert its base currency into CNH, which may be restricted by the availability of CNH of other factors beyond the control of the Management Company, and as a result it may be necessary to make redemption payments in currencies other than CNH.

**Emerging Markets**

Investments in emerging markets may be more volatile than investments in more developed markets. Some of these markets may have relatively unstable governments, economies based on only a few industries, and securities markets that trade only a limited number of securities. Many emerging markets do not have well developed regulatory systems and disclosure standards may be less stringent than those of developed markets. Such instability may result from, among other things, authoritarian governments, or military involvement in political and economic decision making, including changes or attempted changes in governments through non-constitutional means; internal insurgencies; hostile relations with neighbouring countries; and ethnic, religious or racial conflict.

The risk of expropriation, confiscatory taxation, nationalisation and social, political and economic instability are greater in emerging markets than in developed markets. Certain of such countries may have in the past failed to recognise private property rights or nationalised or expropriated the assets of private companies. As a result, the risks of investing in those countries, including the risks of nationalisation, expropriation and repatriation of assets, may be heightened. In addition, unanticipated political or social developments may affect the values of a Portfolio's investments in those countries and the availability to the Portfolios of additional investment in those countries.

In addition to withholding taxes on investment income, some emerging markets may impose different capital gains taxes on foreign investors.

A number of attractive emerging markets restrict, to varying degrees, foreign investment in securities. Further, some attractive equity securities may not be available to one or more of the Portfolios because foreign shareholders hold the maximum amount permissible under current law. Repatriation of investment income, capital and the proceeds of sales by foreign investors may require governmental registration and/or approval in some emerging markets and may be subject to currency exchange control restrictions. Such restrictions may increase the risks of investing in certain of the emerging markets. Unless otherwise specified within the Portfolio's investment objective and policy, a Portfolio will only invest in markets where these restrictions are considered acceptable by the Directors.

Generally accepted accounting, auditing and financial reporting practices in emerging markets may be significantly different from those in developed markets. Compared to mature markets, some emerging markets may have a low level of regulation, enforcement of regulations and monitoring of investors' activities, including trading on material non-public information.

The securities markets of emerging countries have substantially less trading volume, resulting in a lack of liquidity and high price volatility. There may be a high concentration of market capitalisation and trading volume in a small number of issuers representing a limited number of industries as well as a high concentration of investors and financial intermediaries. These factors may adversely affect the timing and pricing of a Portfolio's acquisition or disposal of securities, and it may be difficult to assess the value of a Portfolio's investments.

Practices in relation to settlement of securities transactions in emerging markets involve higher risks than those in developed countries because brokers and counterparties in such countries may be less well capitalised, custody and registration of assets in some countries may be unreliable, and a Portfolio may be required to establish special custodial or other arrangements before making investments. Market practice may require that payment shall be made prior to receipt of the security which is being purchased or that delivery of a security must be made before payment is received. In such cases, default by a counterparty through whom the relevant transaction is effected might result in a loss being suffered by the affected Portfolios. The SICAV will seek, where possible, to use counterparties whose financial status is such that this risk is reduced. However, there can be no certainty that the SICAV will be successful in eliminating this risk for the Portfolios, particularly as counterparties operating in emerging markets frequently lack the substance or financial resources of those in developed countries. Delays in settlement could result in investment opportunities being missed if a Portfolio is unable to acquire or dispose of a security.

There may be less publicly available information about certain financial instruments than some investors would find customary and entities in some countries may not be subject to accounting, auditing and financial reporting standards and requirements comparable to those to which certain investors may be accustomed. Certain financial markets, while generally growing in volume, have for the most part, substantially less volume than more developed markets, and securities of many companies are less liquid and their prices more volatile than securities of comparable companies in more sizeable markets. There are also varying levels of government supervision and regulation of exchanges, financial institutions and issuers in various countries. In addition, the manner in which foreign investors may invest in securities in certain countries, as well as limitations on such investments, may affect the investment operations of certain of the Portfolios.

Emerging Market Country debt will be subject to high risk and will not be required to meet a minimum rating standard and may not be rated for creditworthiness by any internationally recognised credit rating organisation. The issuer or governmental authority that controls the repayment of an emerging country's debt may not be able or willing to repay

the principal and/or interest when due in accordance with the terms of such debt. As a result of the foregoing, a government obligor may default on its obligations. If such an event occurs, the SICAV may have limited legal recourse against the issuer and/or guarantor.

**Emerging Markets – Custody Risk**

Safe custody of securities in emerging markets involves risk and considerations which do not normally apply when settling transactions and providing safe custody services in more developed countries. In circumstances such as the insolvency of a sub-custodian or registrar, or retroactive application of legislation, a Portfolio may not be able to establish title to investments made and may suffer losses as a result. A Portfolio may find it impossible to enforce its rights against third parties.

Custody services are very often undeveloped and, although the SICAV will endeavour to put into place control mechanisms, including the selection of agents to register emerging markets securities on behalf of a Portfolio, there is a significant transaction and custody risk of dealing in securities of emerging markets.

As a Portfolio may invest in markets where custodial and/or settlement systems are not fully developed, assets which are traded in such markets and which have been entrusted to sub-custodians, in circumstances where the use of such sub-custodians is necessary, may be exposed to risk in circumstances where the Depositary will have no liability.

**Emerging Markets – Liquidity Risk**

Lack of liquidity and efficiency in certain of the stock markets or foreign exchange markets in certain emerging markets may mean that from time to time the Investment Manager may experience more difficulty in purchasing or selling holdings of securities than it would in a more developed market. The small size and inexperience of such stock and foreign exchange markets and the limited volume of trading in these countries may make a Portfolio's investments illiquid and more volatile than investments in more established countries.

The Portfolios may invest in shares of companies listed on exchanges which are less liquid and more volatile than the world's leading stock markets and this may result in greater fluctuations in the price of Shares of the Portfolios. There can be no assurance that there will be any market for securities acquired in an emerging market and such lack of liquidity may adversely affect the value or ease of disposal of such securities.

**Use of Derivatives and other Investment Techniques**

The Portfolios may employ techniques and instruments relating to Transferable Securities and other financial liquid assets for either efficient portfolio management *i.e.* to increase or decrease their exposure to changing security prices, interest rates, currency exchange rates, commodity prices or other factors that affect security values and hedging purposes, and/or to attempt to reduce certain risks of its investments and to attempt to enhance return. These techniques may include but are not limited to the use of options, forward currency exchange contracts, futures contracts, contracts for difference and swaps (including credit default swaps, credit default swaps on eligible loan indices, interest rate swaps and, to the extent permitted by the relevant Portfolio's investment policy, total/excess return swaps) and other investment techniques described in Appendix B.I "Investment Techniques and Instruments".

Participation in the options or futures markets and in currency exchange or contracts for difference or swap transactions involves investment risks and transactions costs to which the Portfolios would not be subject in the absence of the use of these strategies. The use of derivatives and other techniques carries high risk and leverage risk in particular. Leverage has the effect of increasing the magnitude of any profits compared to if there were no leverage; however, it also increases the level of any loss. This is the risk arising from the use of relatively small financial resources to obtain a large number of market positions. In a falling market, leverage can increase the losses on the derivative positions concerned. In a falling market, the sale of options and other currency derivatives or other assets may mean that their entire purchase price or premiums are lost.

The use of such techniques and instruments for the Portfolios is, however, subject to special limits (see Appendix A).

The SICAV may use these techniques to adjust the risk and return characteristics of a Portfolio's investments. If the Management Company or the relevant Investment Manager judges market conditions incorrectly or employs a strategy that does not correlate well with a Portfolio's investments, these techniques could result in a loss, regardless of whether the intent was to reduce risk or increase return. These techniques may increase the volatility of a Portfolio and may involve a small investment of cash relative to the magnitude of the risk assumed. In addition, these techniques could result in a loss if the counterparty of the transaction does not perform as promised. Portfolios engaging in contracts for difference or swap transactions are also exposed to a potential counterparty risk. In the case of insolvency or default of the swap counterparty, the Portfolio involved could suffer a loss.

There can be no assurance that the Management Company or the relevant Investment Manager will be able to successfully hedge the Portfolios or that the Portfolios will achieve their investment objectives.

Derivative instruments, including but not limited to swaps, futures, and certain FX contracts, are subject to new regulations such as EMIR, MiFID II/MiFIR and similar regulatory regimes in the U.S., Asia, and other global jurisdictions. The implementation of such regulations, including new requirements requiring mandatory clearing and margining, may increase the overall costs to the SICAV of entering into and maintaining such derivative instruments and may impact the SICAV's returns or the ability of the Investment Managers to achieve their investment objectives. Global regulation of derivative instruments is a rapidly-changing area and, as such, the full effects of present or future legislation or regulations in this area are not known, but could be substantial and adverse.

Certain Portfolios of the SICAV may also invest in financial derivative instruments as a principal investment objective, as more fully described in the investment policy of the relevant Portfolios, which may entail additional risks for Shareholders. The SICAV may use either the Value at Risk ("**VaR**") approach (absolute or relative VaR approach, depending on the Portfolio) or, as the case may be, the Commitment Approach in order to calculate the global exposure of a Portfolio to financial derivative instruments (the "Global Exposure"), it being understood that the Global Exposure of a Portfolio may not exceed the total net asset value of such Portfolio.

The below table shows, for each Portfolio of the SICAV using the VaR approach to determine Global Exposure:

- the methodology used to determine the Portfolio's Global Exposure (absolute VaR approach / relative VaR approach);
- the expected level of leverage (disclosed, for the sake of clarity, on the basis of the sum of the notionals approach and on the basis of the Commitment Approach). The actual risks relating to a Portfolio and the use of financial derivative instruments by such Portfolio are not affected by the leverage-calculation method used;
- for Portfolios using the relative VaR approach, details on the performance tracked by the relevant reference portfolio used.

| **Name of Portfolio** | **Methodology Used to determine Global Exposure** | **Leverage** | |
|---|---|---|---|
| | | **Sum of Notionals** | **Commitment Approach** |
| **European Short-Term High Yield Bond** | Relative VaR (performance tracked by reference to the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged)) | 0-200% | 0-100% |
| **European Strategic Bond** | Relative VaR (performance tracked by reference to the ICE BofA 1-7 Year All Euro Government Index (20%), ICE BofA 1-10 Year Euro Corporate Index (40%) and ICE BofA European Currency High Yield Constrained Index (40%)) | 0-500% | 0-300% |
| **Enhanced Commodities** | Relative VaR (performance tracked by reference to the Bloomberg Commodity Index) | 0-700% | 0-400% |
| **Flexible Asian Bond** | Relative VaR (performance tracked by reference to the J.P. Morgan Asia Credit Index Diversified) | 0-300% | 0-50% |
| **Global Corporate Bond** | Relative VaR (performance tracked by reference to the Bloomberg Global Aggregate Corporate Index (USD Hedged)) | 0-500% | 0-300% |

| | | | |
|---|---|---|---|
| **American Extended Alpha** | Relative VaR (performance tracked by reference to the S&P 500 Index) | 0-300% | 0-200% |
| **Global Extended Alpha** | Relative VaR (performance tracked by reference to the MSCI ACWI Index) | 0-200% | 0-200% |
| **Global Real Estate Securities** | Relative VaR (performance tracked by reference to the FTSE EPRA Nareit Developed NR Index) | 0-400% | 0-250% |
| **Global Multi Asset Income** | Relative VaR (performance tracked by reference to the MSCI ACWI Index (45%), ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index (USD Hedged) (30%), Bloomberg Global Aggregate Index (USD Hedged) (20%) and 30-day Average Secured Overnight Financing Rate (SOFR) (5%)) | 0-300% | 0-50% |
| **Credit Opportunities** | Absolute VaR | 0-700% | 0-350% |
| **Pan European Absolute Alpha** | Absolute VaR | 0-200% | 0-100% |

**The table above shows the expected level of leverage. Shareholders are informed that the actual levels may be higher than the ranges shown in the above table.** Where leverage is high, additional measures are used to monitor the Portfolio's risk profile.

**Credit Risk**

Investors in a Portfolio should be aware that such an investment may involve credit risk. Bonds or other debt securities involve credit risk to the issuer which may be evidenced by the issuer's credit rating. Credit ratings only constitute preliminary indicators of investment quality. Securities which are subordinated and/or have a lower credit rating are generally considered to have a higher credit risk and a greater possibility of default than more highly rated securities. In the event that any issuer of bonds or other debt securities experiences financial or economic difficulties, this may affect the value of the relevant securities (which may be zero) and any amounts paid on such securities (which may be zero). This may in turn affect the Net Asset Value per Share.

Investors in any Portfolio investing in OTC derivatives should be aware that the assets covering the obligations of such Portfolio under such OTC derivatives, where applicable, will generally include bonds or other debt instruments that involve credit risk that may be retained by such Portfolio.

**Counterparty Risk**

This risk relates to the quality of the counterparty with whom the Management Company or the relevant Investment Manager does business, in particular for the settlement/delivery of financial instruments, the conclusion of financial forward contracts or of total return swaps. In the event of the default of a counterparty, affected Portfolios may suffer losses to the extent that the counterparty is unable to meet its obligations to such Portfolios. This risk cannot be eliminated but can be mitigated through the taking of collateral.

The risk reflects the counterparty's ability to honour its commitments (payment, delivery, repayment, etc.).

**Collateral**

There is a risk that the value of collateral held by the Portfolio or that the proceeds resulting from the realisation of the collateral are not sufficient to cover the Portfolio's exposure to an insolvent counterparty and that the Portfolio may not recover any subsequent shortfall. This may occur for instance in cases where there is no or limited liquidity on the markets or where the price volatility is high and the collateral cannot be sold at a fair price. The Portfolio is also exposed to the risk of insolvency of the bank with which cash collateral is placed.

In addition, it cannot be excluded that, in certain circumstances, insufficient coverage of the counterparty's exposure or failure by the counterparty to return the collateral when due may occur as a result of a technical or operational failure. The SICAV seeks to deal with reputable counterparties so that this risk is reduced. Legal arrangements entered

into with the counterparty may also not be enforceable in the courts of the relevant jurisdiction, in which case the Portfolio will be unable to enforce its rights over the collateral it has received.

**Options and futures on currencies and other assets**

The sale of calls on currencies and other assets commits the relevant Portfolio to supply the underlying asset to the call purchaser if he or she exercises the option to buy. This gives rise to the risk that, if the option is exercised, the Portfolio could either fail to benefit from any significant rise in the value of the underlying asset or be forced to purchase that asset on the open market at a higher price in order to supply it to the counterparty to the contract. In the case of the sale of puts on currencies or other assets, the risk is that the relevant Portfolio will be forced to buy those currencies or other assets at the strike price, even though their market prices may be significantly lower at the exercise date. The value of fund assets could be more adversely affected by option leverage than by the direct purchase of currencies or other assets.

Similar risks accompany financial futures in which the parties to the contract agree to deliver an agreed asset or currency at an agreed time at an agreed price. Leverage and its associated risks exist here too because only one part of the contract (the "**margin**") must be delivered immediately. Sharp price fluctuations in either direction on the margin can produce major gains or losses. In private transactions, the duty to make margin payments need not necessarily apply.

**Financial derivatives on indices or sub-indices**

Some Portfolios may invest in financial derivative instruments on indices or sub-indices. When investing in such instruments, there is no assurance that the underlying index or sub-index will continue to be calculated and published or that it will not be amended significantly. Any change to the underlying index or sub-index may adversely affect the value of the relevant instrument. The past performance of an index or sub-index is not necessarily a guide to its future performance.

When a Portfolio invests in a financial derivative instrument on an index or a sub-index, the relevant Investment Manager will not actively manage the underlying components of such financial derivative instrument. The selection of the underlying components will be made in accordance with the relevant index composition rules and eligibility criteria and not by reference to any performance criteria or performance outlook.

Investors should be aware that investments in financial derivative instruments on indices or sub-indices involve assessing the risk of an investment linked to the relevant index or sub-index and, where applicable, the techniques used to link the investment to the underlying index or sub-index.

The value of the underlying indices or sub-indices and the value of the techniques used to link the investment to them may vary over time and may increase or decrease by reference to a variety of factors which may include, amongst others, corporate actions, macro-economic factors and speculation.

**Investment in warrants**

Warrants confer on the investor the right to subscribe a fixed number of ordinary shares in the relevant company at a pre-determined price for a fixed period.

The cost of this right will be substantially less than the cost of the share itself. Consequently, the price movements in the share will be multiplied in the price movements of the warrant. This multiplier is the leverage or gearing factor. The higher the leverage the more attractive the warrant. By comparing, for a selection of warrants, the premium paid for this right and the leverage, their relative worth can be assessed. The levels of the premium and gearing can increase or decrease with investor sentiment. Warrants are therefore more volatile and speculative than ordinary shares. Investors should be warned that prices of warrants are extremely volatile and that furthermore, it may not always be possible to dispose of them.

The gearing effect of investments in warrants and the volatility of warrant prices make the risks attached to investment in warrants higher than is the case with investments in equities.

**Mortgage-backed securities**

Some Portfolios may invest in mortgage derivatives, including mortgage-backed securities. Mortgage pass-through securities are securities representing interests in "pools" of mortgages in which payments of both interest and principal on the securities are made monthly, in effect "passing through" monthly payments made by the individual borrowers on the residential mortgage loans which underlie the securities. Early or late repayment of principal based on an expected repayment schedule on mortgage pass-through securities held by such Portfolios (due to early or late repayments of principal on the underlying mortgage loans) may result in a lower rate of return when the Portfolios reinvest

such principal. In addition, as with callable fixed-income securities generally, if the Portfolios purchased the securities at a premium, sustained earlier than expected repayment would reduce the value of the security relative to the premium paid. When interest rates rise or decline the value of a mortgage-related security generally will decline, or increase but not as much as other fixed-income, fixed-maturity securities which have no prepayment or call features.

Payment of principal and interest on some mortgage pass-through securities (but not the market value of the securities themselves) may be guaranteed by the U.S. Government, or by agencies or instrumentalities of the U.S. Government (which guarantees are supported only by the discretionary authority of the U.S. Government to purchase the agency's obligations). Certain mortgage pass-through securities created by non-governmental issuers may be supported by various forms of insurance or guarantees, while other such securities may be backed only by the underlying mortgage collateral.

Some Portfolios may also invest in Investment Grade collateralised mortgage obligations ("**CMOs**"), which are structured products backed by underlying pools of mortgage pass-through securities. Similar to a bond, interest and prepaid principal on a CMO are paid, in most cases, monthly. CMOs may be collateralised by whole residential or commercial mortgage loans but are more typically collateralised by portfolios of residential mortgage pass-through securities guaranteed by the U.S. Government or its agencies or instrumentalities. CMOs are structured into multiple Classes, with each Class having a different expected average life and/or stated maturity. Monthly payments of principal, including prepayments, are allocated to different Classes in accordance with the terms of the instruments, and changes in prepayment rates or assumptions may significantly affect the expected average life and value of a particular Class.

Some Portfolios may invest in principal-only or interest-only stripped mortgage-backed securities. Stripped mortgage-backed securities have greater volatility than other types of mortgage-related securities. Stripped mortgage-backed securities which are purchased at a substantial premium or discount generally are extremely sensitive not only to changes in prevailing interest rates but also to the rate of principal payments (including prepayments) on the related underlying mortgage assets, and a sustained higher or lower than expected rate of principal payments may have a material adverse effect on such securities' yield to duration. In addition, stripped mortgage securities may be less liquid than other securities which do not include such a structure and are more volatile if interest rates move unfavourably.

The Management Company expects that government, government-related or private entities may create other mortgage-related securities in addition to those described above. As new types of mortgage-related securities are developed and offered to investors, the Management Company will consider making investments in such securities, provided they are dealt in on a Regulated Market.

**Non-traditional Debt Securities**

The Bond Portfolios and particularly high yield Bond Portfolios are generally permitted to invest in a range of fixed interest securities which includes non-traditional types of debt securities. These may include (without limitation) regulatory capital (such as Tier 1 and Tier 2 capital), subordinated debt, and various forms of contingent capital securities including but not limited to Contingent Convertible Bonds. These securities may possess features such as coupon deferral or cancellation, resettable coupon rates, loss of capital or conversion to equity. Such investment may be made by the Portfolios but will only be permitted in accordance with the Portfolio's investment objective and policy and within the existing risk profile of the Portfolio.

In line with ESMA communication 2014/944, Contingent Convertible Bonds have specific risks associated such as:

- Coupon cancellation: coupon payments are entirely discretionary and may be cancelled by the issuer at any point, for any length of time;
- Trigger level risk: Trigger levels differ and determine exposure to conversion risk depending on the distance of the capital ratio to the trigger level. It might be difficult for the Investment Manager of the relevant Portfolio to anticipate the triggering events that would require debt to convert into equity;
- Capital structure inversion risk: contrary to classic capital hierarchy, investors in Contingent Convertible Bonds may suffer a loss of capital when equity holders do not;
- Call extension risk: Contingent Convertible Bonds are issued as perpetual instruments, callable at pre-determined levels only with the approval of the issuer. It cannot be assumed that the perpetual Contingent Convertible Bonds will be called on call date. Contingent Convertible Bonds are a form of permanent capital. The investor may not receive return of principal if expected on call date or indeed at any date.

The above risk factors do not purport to be a complete explanation of the risks involved in investing in Shares of the relevant Portfolio.

**Asset-backed Transferable Securities**

Some Portfolios may also invest in asset-backed Transferable Securities. Asset-backed Transferable Securities represent a participation in, or are secured by and payable from, a stream of payments generated by particular assets, most often a pool of assets similar to one another, such as motor vehicle receivables or credit card receivables, home equity loans, manufactured housing loans or bank loan obligations.

**Structured products**

Some Portfolios may invest in structured products. These include interests in entities organised solely for the purpose of restructuring the investment characteristics of certain other investments. These investments are purchased by the entities (frequently special purpose vehicles that are part of limited recourse structures), which then issue Transferable Securities (the structured products) backed by, or representing interests in, the underlying investments. The cash flow from the underlying investments may be apportioned among the newly issued structured products to create Transferable Securities with different investment characteristics such as varying maturities, payment priorities or interest rate provisions, and the extent of the payments made with respect to structured investments depends on the amount of the cash flow from the underlying investments or the movement in value of the underlying investment.

Structured products are subject to the risks associated with the underlying market or security, and may be subject to greater volatility than direct investments in the underlying market or investment. Structured products may entail the risk of loss of principal and/or interest payments as a result of movements in the underlying market or investment. Structured products are also subject to the credit risk of any other entities forming part of the structure, as the ability of the issuer to meet its obligations under the Transferable Securities may be dependent on upon payments due from other participants.

Some Portfolios may also invest in credit linked securities referenced to underlying securities, instruments, baskets of securities or indices. These securities are subject to both counterparty risk and the risks inherent in the underlying investment. The counterparty risk lies with each party with whom the Management Company or the Investment Managers contract on behalf of the SICAV for the purpose of making investments (the counterparty). The underlying investment risk lies with the sovereign or corporate entity against which payments made under the product are referenced.

**Credit default swaps**

Some Portfolios may also enter into credit default swap transactions which can be subject to higher risk than direct investment in debt securities. The market for credit default swaps may from time to time be less liquid than debt securities markets. The “buyer” (of protection) in a credit default swap transaction is obliged to pay the “seller” a periodic stream of payments over the term of the contract provided that no event of default on an underlying reference obligation has occurred. If an event of default occurs, the seller must pay the buyer the full notional value, or “par value”, of the reference obligation in exchange for the reference obligation. The Portfolios, if sellers, will lose their investment and recover nothing. However, if an event of default occurs, the Portfolios (if buyers) will receive the full notional value of the reference obligation that may have little or no value. As sellers, the Portfolios receive a fixed rate of income throughout the term of the contract, which is typically between six months and three years, provided that there is no event of default.

The above mentioned Portfolios may also purchase credit default swap contracts in order to hedge against the risk of default of debt securities they hold in their portfolios. This would also involve the risk that the swap may expire worthless and would only generate income in the event of an actual default by an issuer of the underlying obligation as opposed to a credit downgrade or other indication of financial instability. This would also involve credit risk: the risk that the seller may fail to satisfy its payment obligations to the Portfolios in the event of a default. To mitigate the counterparty risk resulting from credit default swaps transactions, the Portfolios will only enter into credit default swaps with highly rated financial institutions specialised in this type of transaction.

**Interest rate swaps**

Some Portfolios may enter into an interest rate swap, in which one party exchanges a stream of interest for another party's stream. This type of swap is a contractual agreement entered into between two counterparties under which each agrees to make periodic payment to the other for an agreed period of time based upon a notional amount of principal. Under the commonest form of interest rate swap, a series of payments calculated by applying a fixed rate of interest to a notional principal amount is exchanged for a stream of payments similarly calculated but using a floating rate of interest. The use of swaps involves counterparty risk, although this risk is mitigated by entering into agreements with credit institutions or their affiliated brokers established in a country belonging to the Group of ten or a member state of the EEA and which have at least an investment grade rating.

**Total/Excess return swaps**

Some Portfolios may enter into a total return swap and/or excess return swap in which one party receives interest payments on a reference asset plus any capital gains and losses over the payment period, while the other receives a specified fixed and/or floating cash flow unrelated to the performance of the reference asset. These swaps allow Portfolios to take exposure to different types of investments and depending on their use, they may increase or decrease the volatility of the Portfolio. The value of the total return swap and/or excess return swap varies over time and the Portfolio must be prepared to meet its commitments as they fall due. The use of swaps involves counterparty risk, although this risk is mitigated by entering into agreements with credit institutions or their affiliated brokers established in a country belonging to the Group of ten or a member state of the EEA and which have at least an investment grade rating. The use of swaps also exposes the Portfolios to market risk, as the value of the underlying reference asset may rise or fall. This may have a positive or negative impact on the Portfolio's return depending on whether the Portfolio has gained long or short exposure to the underlying reference asset.

Portfolios investing in total return swaps use them as an integral part of the investment policy, and use them on a continuous basis regardless of market conditions. The expected levels of exposure to total return swaps are disclosed in the investment objective and policy of each Portfolio.

Where a Portfolio uses total return swaps or a similar type of instrument for investment purposes, the strategy and the underlying reference asset to which the Portfolio takes exposure are those described in the investment strategy of the relevant Portfolio. Total return swaps are primarily used for implementing components of the investment strategy that can only be achieved through derivatives, for example to gain short exposure to certain securities.

The following Portfolios are permitted to enter into total return swaps. A Portfolio that is not listed below is not permitted to enter into total return swaps:

- Pan European Absolute Alpha
- American Extended Alpha
- Global Extended Alpha
- Enhanced Commodities
- European Short-Term High Yield Bond
- US High Yield Bond
- Credit Opportunities
- Global Real Estate Securities

**Equity swaps**

Some Portfolios may enter into an equity swap which is a swap where a set of future cash flows are exchanged between two counterparties. One of these cash flow streams will typically be based on a reference interest rate. The other will be based on the performance of a share of stock or stock market index. The use of swaps involves counterparty risk, although this risk is mitigated by entering into agreements with credit institutions or their affiliated brokers established in a country belonging to the Group of ten or a member state of the EEA and which have at least an investment grade rating.

**Currency Fluctuations**

All globally invested Portfolios will be exposed to currencies other than the Base Currency, which may increase the volatility of the Net Asset Value of the Portfolios. In addition, those Portfolios exposed to emerging markets currencies may experience even greater volatility.

Some currencies may experience significant declines against some other currencies and devaluation of any such currencies may occur subsequent to the investment in these currencies by a Portfolio. The value of the assets of the Portfolio, as measured in one currency, may consequently be affected unfavourably by such devaluations. In addition, the Portfolios may engage in certain currency transactions, where available, in an attempt to hedge the Portfolio's currency risks. Such transactions may entail additional costs.

While the factors described above may result in a generally higher risk with respect to emerging markets, the Portfolios will attempt to manage this risk through diversification of investments within the Portfolio.

**Commodity indices**

Some Portfolios may invest in commodity indices comprised of futures contracts on physical commodities in certain sectors. Unlike equities, which typically entitle the holder to a continuing stake in a corporation, commodity futures contracts normally specify a certain date for delivery of the underlying physical commodity. As the futures contracts that the index comprises approach expiration, they are replaced by contracts that have a later expiration. For example, a contract purchased and held in August may have an October expiration. As time passes, the contract expiring

in October is replaced by a contract for delivery in November. This process is referred to as "rolling". Those Portfolios which invest in rolling indices could be positively or negatively affected depending on whether the underlying market is in "backwardation", or "contango". If the market for these contracts is in "backwardation", where the prices are lower in the distant delivery months than in the nearer delivery months, the sale of the October contract would take place at a price that is higher than the price of the November contract, thereby creating a "roll yield". Conversely, contango markets are those in which the prices of contracts are higher in the distant delivery months than in the nearer delivery months. The absence of backwardation in the commodity markets could result in negative "roll yields", which could adversely affect the value of the index and, accordingly, adversely affect the market value of the Portfolio.

Portfolios investing in commodity indices will be affected by the underlying commodity markets and the underlying commodities may perform very differently to the traditional securities markets such as equities and bonds. Commodity prices may change unpredictably, affecting the index and the level of the index and the value of the Portfolio in unforeseeable ways. Trading in futures contracts associated with the index commodities is speculative and can be extremely volatile.

Commodity indices may be particularly susceptible to fluctuation and may fluctuate rapidly based on numerous factors affecting the underlying commodities, including: changes in supply and demand relationships; weather; trade; fiscal, monetary and exchange control programs; domestic and foreign political and economic events and policies; disease; technological developments and changes in interest rates. These factors may affect the level of the index and the value of the relevant Portfolio in varying ways, and different factors may cause the value of the index commodities, and the volatility of their prices, to move in inconsistent directions at inconsistent rates. This could adversely affect the value of the Portfolio.

The commodities underlying the index components may be produced in a limited number of countries and may be controlled by a small number of producers, political, economic and supply related events in such countries could have a disproportionate impact on the prices of such commodities and the value of the index.

**Exchange traded notes**

Some Portfolios may invest in exchange traded securitised or structured notes ("**Notes**") linked to the performance of a reference asset issued by certain counterparties (the "**Note Provider**"). Changes in the credit ratings of the Note Provider may affect the market value of the reference asset. Credit ratings are an assessment of the Note Provider's ability to pay its obligations, including those on the Notes. Consequently, actual or anticipated changes in the Note Provider's credit ratings may affect the market value of the Notes. However, because the return on the Notes is dependent upon certain factors in addition to the Note Provider's ability to pay its obligations on the Notes, an improvement in the credit ratings of the Note Provider will not reduce the other investment risks related to the Notes.

**Investment in other UCIs (including Exchange Traded Funds)**

Some Portfolios may invest in other UCIs. Investment decisions of such underlying UCIs are made at the level of such UCIs. There can be no assurance that the selection of the managers of the underlying UCIs will result in an effective diversification of investment styles and that positions taken by the underlying UCIs will always be consistent. The underlying UCIs may not be subject to the supervision of the CSSF and may be less regulated; custody and audit rules may notably differ. The valuations of the assets of the underlying UCIs may not be verified by an independent third party on a regular or timely basis.

Both the Portfolio and the underlying UCIs will have costs and impose fees and commissions, which will cause a higher level of fees than if the investors invested directly in the underlying UCIs. However, when a Portfolio invests in units/shares of other UCITS and/or other UCI which are managed, either directly or by delegation, by the Management Company or any appointed Investment Manager or by any other company with which the Management Company or any appointed Investment Manager is linked by common management or control, or by a substantial direct or indirect holding, the Management Company or any appointed Investment Manager or other company may not charge subscription or redemption fees on account of the Portfolio's investment in the units of such other UCITS and/or UCIs. The maximum management fees of other UCIs or UCITS in which a Portfolio may invest shall not exceed the percentage indicated in the "Other Investment Practices" section.

Some underlying UCIs may invest in assets that are not readily realisable or may be hard to value. The value of these assets is a matter of the relevant valuation agent's policy and the true value may not be recognised until the asset is sold. This may be an ongoing risk for UCIs investing in property, but could also include other asset classes in extreme market conditions. There may be occasions where UCIs restrict redemptions and as such the Portfolios may not be able to liquidate a position in such UCIs. In a falling market this may result in losses to the Portfolios.

**Investment in real estate securities**

Some Portfolios may invest in real estate securities. By comparison with other sectors, some securities in the real estate securities sector may be comparatively small, less liquid and more volatile. This may result in greater volatility in the Net Asset Value of Portfolios investing in real estate securities than would be the case in relation to Portfolios invested in other sectors.

Price fluctuations affecting the real estate sector as a whole can affect the prices of individual real estate securities. The performance of a Portfolio investing in real estate securities may be adversely affected by the impact of the price at which real estate securities trade in a downturn in the real estate market in terms of capital value or a weakening of rental yields. This may also have an effect on the amount and value of any dividends or other distributions payable in respect of any investment in real estate securities.

Security specific risk is inherent in a particular real estate security's performance due to factors that are pertinent to that security, such as the security's underlying property assets, rental levels achieved, vacancy rates, management strategy or levels of debt/leverage. These factors will cause a security's return to differ from that of the market.

**Investment in REITs**

Some Portfolios may invest in REITs. Investment in REITs involves certain unique risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by such REIT, while mortgage REITs may be affected by the quality of any credit extended. REITs are dependent upon management skills, are not diversified, are subject to heavy cash flow dependency, default by borrowers and self-liquidation.

Investing in REITs may involve risks similar to those associated with investing in small capitalisation companies. REITs may have limited financial resources, may trade less frequently and in a limited volume and may be subject to more abrupt or erratic price movements than larger company securities.

**Custody Risk**

Without prejudice to the obligations of the Depositary under Luxembourg law and to any related legal actions that may be available in this respect, the SICAV may be exposed to risk in relation to the custody of its assets particularly but not exclusively cash, where - depending on factors such as the legal regime in the country of custody or local market practice or other factors - assets may not be fully protected.

In the unlikely event of this happening, the SICAV's assets may be lost or access to SICAV assets may be barred temporarily or permanently. Legal proceedings to retrieve such assets and/or for damages may or may not be successful and may be time consuming. Therefore, these factors may lead to disruptions of the operations of the SICAV, ultimately assets of the SICAV may be lost, and consequently the Net Asset Value may be reduced.

**Investments in the PRC and the China–Hong Kong Stock Connect Programme**

In addition to the usual risks of investing in emerging markets there are some specific risks connected to the China-Hong Kong Stock Connect Programme. While the economy of the PRC is in a state of transition, in extreme circumstances, the Portfolios may incur losses due to limited investment capabilities. The Portfolios may not be able to invest in China A-Shares, access the PRC market through the programme, fully implement or pursue their investment objectives or strategy due to local investment restrictions, illiquidity of the PRC domestic securities market, suspension in the trading through the programme and/or delay or disruption in execution and settlement of trades.

All Hong Kong and overseas investors in the China-Hong Kong Stock Connect Programme will trade and settle securities listed in mainland stock exchanges approved by the relevant authorities in Chinese offshore renminbi only. Such Portfolios will be exposed to any fluctuation in the exchange rate between the Base Currency of the relevant Portfolio and Chinese offshore renminbi in respect of such investments.

The Chinese offshore renminbi exchange rate is a managed floating exchange rate based on market supply and demand with reference to a basket of foreign currencies. The daily trading price of the Chinese offshore renminbi against other major currencies in the inter-bank foreign exchange market is allowed to float within a narrow band around the central parity published by the PRC.

Convertibility from Chinese offshore renminbi to Chinese onshore renminbi is a managed currency process subject to foreign exchange control policies of and repatriation restrictions imposed by the government of the PRC. Under the current regulations in the PRC, the value of Chinese offshore renminbi and Chinese onshore renminbi may be different due to a number of factors including without limitation those foreign exchange control policies and repatriation restrictions and therefore is subject to fluctuations.

The China-Hong Kong Stock Connect Programme are securities trading and clearing linked programmes developed by Hong Kong Exchanges and Clearing Limited ("**HKEx**"), Shanghai Stock Exchange ("**SSE**"), Shenzhen Stock Exchange ("**SZSE**") and China Securities Depository and Clearing Corporation Limited ("**ChinaClear**") with an aim to achieve mutual stock market access between mainland China and Hong Kong. These programmes allow foreign investors to trade eligible China A-Shares listed in mainland stock exchanges approved by the relevant authorities, through their Hong Kong based brokers.

Further information about China-Hong Kong Stock Connect Programme is available online at the website: http://www.hkex.com.hk/eng/market/sec_tradinfra/chinaconnect/chinaconnect.htm.

The Portfolios investing in the domestic securities markets of the PRC may use the China-Hong Kong Stock Connect Programme and other similarly regulated programmes and are subject to the following additional risks:

- the relevant regulations relating to the China-Hong Kong Stock Connect Programme are untested and subject to change which may have potential retrospective effect. There is no certainty as to how they will be applied which could adversely affect the Portfolios. The programmes require use of new information technology systems which may be subject to operational risk due to its cross-border nature. If the relevant systems fail to function properly, trading in both Hong Kong and Shanghai and any other relevant markets through the programmes could be disrupted;

- where securities are held in custody on a cross-border basis, there are specific legal/beneficial ownership risks linked to compulsory requirements of the local central securities depositaries, Hong Kong Securities Clearing Company Limited ("**HKSCC**") and ChinaClear;

- as in other emerging markets, the legislative framework is beginning to develop the concept of legal/formal ownership and of beneficial ownership or interest in securities. In addition, HKSCC, as nominee holder, does not guarantee the title to China-Hong Kong Stock Connect Programme securities held through them and is under no obligation to enforce title or other rights associated with ownership on behalf of beneficial owners. Consequently, the courts may consider that any nominee or custodian as registered holder of China-Hong Kong Stock Connect Programme securities would have full ownership, and that those China-Hong Kong Stock Connect Programme securities would form part of the pool of assets of such entity available for distribution to creditors of such entities and/or that a beneficial owner may have no rights whatsoever in respect. Consequently, the Portfolios and the Depositary cannot ensure that the Portfolios' ownership of these securities or title is assured;

- to the extent that HKSCC is deemed to be performing safekeeping functions with respect to assets held through it, it should be noted that the Depositary and the Portfolios will have no legal relationship with HKSCC and no direct legal recourse against HKSCC in the event that the Portfolios suffer losses resulting from the performance or insolvency of HKSCC;

- In the event ChinaClear defaults, HKSCC's liabilities under its market contracts with clearing participants will be limited to assisting clearing participants with claims. HKSCC will act in good faith to seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or the liquidation of ChinaClear. In this event, a Portfolio may not fully recover any losses or its China-Hong Kong Stock Connect Programme securities and the process of recovery could also be delayed;

- the HKSCC provides clearing, settlement, nominee functions and other related services of the trades executed by Hong Kong market participants. PRC regulations which include certain restrictions on selling and buying will apply to all market participants. In the case of sale, pre-delivery of shares is required by the broker, increasing counterparty risk. Because of such requirements, the Portfolios may not be able to purchase and/or dispose of holdings of China A-Shares in a timely manner;

- daily quota limitations are applied to the China-Hong Kong Stock Connect Programme which does not belong to the Portfolios and can only be utilized on a first-come-first serve basis. This may restrict the Portfolios ability to invest in China A-Shares through the programmes on a timely basis;

- the China-Hong Kong Stock Connect Programme will only operate on days when both the PRC and Hong Kong markets are open for trading and when banks in each respective market are open on the corresponding settlement days. There may be occasions when it is a normal trading day for the PRC market but the Portfolios cannot carry out any China A-Shares trading. The Portfolios may be subject to risks of price fluctuations in China A-Shares during the time when China-Hong Kong Stock Connect Programme not trading as a result;

- the Portfolios will not benefit from local China investor compensation schemes.

**Risks associated with the ChiNext market of the Shenzhen Stock Exchange ("SZSE") and/or the Science and Technology Innovation Board of the Shanghai Stock Exchange ("SSE")**

The Portfolios may have exposure to stocks listed on ChiNext market of the SZSE and/or the Science and Technology Innovation Board of the SSE ("**STAR Board**") and may be subject to the following risks:

- Higher fluctuation on stock prices and liquidity risk - Listed companies on the ChiNext market and/or STAR Board are usually of emerging nature with smaller operating scale. Listed companies on ChiNext market and STAR Board are subject to wider price fluctuation limits, and due to higher entry thresholds for investors may have limited liquidity, compared to other boards. Hence, companies listed on these boards. Hence, companies listed on these boards are subject to higher fluctuation in stock prices and liquidity risks and have higher risks and turnover ratios than companies listed on the main board.

- Over-valuation risk - Stocks listed on ChiNext market and/or STAR Board may be overvalued and such exceptionally high valuation may not be sustainable. Stock price may be more susceptible to manipulation due to fewer circulating shares.

- Differences in regulation - The rules and regulations regarding companies listed on ChiNext market and/or STAR Board are less stringent in terms of profitability and share capital than those in the main boards.

- Delisting risk - It may be more common and faster for companies listed on the ChiNext market and/or STAR Board to delist. ChiNext market and STAR Board have stricter criteria for delisting compared to the main boards. This may have an adverse impact on the relevant Portfolio if the companies that it invests in are delisted.

- Concentration risk - STAR Board is a newly established board and may have a limited number of listed companies during the initial stage. Investments in STAR Board may be concentrated in a small number of stocks and subject the relevant Portfolio to higher concentration risk.

Investments in the ChiNext market and/or STAR Board may result in significant losses for the relevant Portfolio and its investors.

**Risks associated with China Interbank Bond Market via Northbound Trading Link under Bond Connect**

Bond Connect is a new initiative launched in July 2017 for mutual bond market access between Hong Kong and Mainland China established by China Foreign Exchange Trade System & National Interbank Funding Centre ("**CFETS**"), China Central Depository & Clearing Co., Ltd, Shanghai Clearing House, and Hong Kong Exchanges and Clearing Limited and Central Moneymarkets Unit.

Under the prevailing regulations in Mainland China, eligible foreign investors will be allowed to invest in the bonds circulated in the China Interbank Bond Market through the northbound trading of Bond Connect ("Northbound Trading Link"). There will be no investment quota for Northbound Trading Link.

Under the Northbound Trading Link, eligible foreign investors are required to appoint the CFETS or other institutions recognised by the People's Bank of China ("**PBOC**") as registration agents to apply for registration with the PBOC.

Pursuant to the prevailing regulations in Mainland China, an offshore custody agent recognised by the Hong Kong Monetary Authority (currently, the Central Moneymarkets Unit) shall open omnibus nominee accounts with the onshore custody agent recognised by the PBOC (currently, the China Central Depository & Clearing Co., Ltd and Shanghai Clearing House). All bonds traded by eligible foreign investors will be registered in the name of Central Moneymarkets Unit, which will hold such bonds as a nominee owner.

Market volatility and potential lack of liquidity due to low trading volume of certain debt securities in the China Interbank Bond Market may result in prices of certain debt securities traded on such market fluctuating significantly. The Portfolios investing in such market are therefore subject to liquidity and volatility risks. The bid and offer spreads of the prices of such securities may be large, and the Portfolios may therefore incur significant trading and realisation costs and may even suffer losses when selling such investments.

To the extent that the Portfolios transact in the China Interbank Bond Market, the Portfolios may also be exposed to risks associated with settlement procedures and default of counterparties. The counterparty which has entered into a transaction with the Portfolios may default in its obligation to settle the transaction by delivery of the relevant security or by payment for value.

For investments via Bond Connect, the relevant filings, registration with the PBOC and account opening have to be carried out via an onshore settlement agent, offshore custody agent, registration agent or other third parties (as the case may be). As such, the Portfolios are subject to the risks of default or errors on the part of such third parties.

Investing in the China Interbank Bond Market via Bond Connect is also subject to regulatory risks. The relevant rules and regulations on these regimes are subject to change which may have potential retrospective effect. In the event that the relevant Mainland Chinese authorities suspend account opening or trading on the China Interbank Bond Market, the Portfolios' ability to invest in the China Interbank Bond Market will be adversely affected. In such event, the Portfolios' ability to achieve its investment objective will be negatively affected.

Trading through Bond Connect is performed through newly developed trading platforms and operational systems. There is no assurance that such systems will function properly or will continue to be adapted to changes and developments in the market. In the event that the relevant systems fail to function properly, trading through Bond Connect may be disrupted. The Portfolios' ability to trade through Bond Connect (and hence to pursue its investment strategy) may therefore be adversely affected. In addition, where the Portfolios invest in the China Interbank Bond Market through Bond Connect, they may be subject to risks of delays inherent in the order placing and/or settlement systems.

**PRC Tax risk**

There are risks and uncertainties associated with the current PRC tax laws, regulations and practice in respect of capital gains realised via the Shanghai-Hong Kong stock connect and Shenzhen-Hong Kong stock connect ("**Stock Connects**") (which may have retrospective effect). Any increased tax liabilities on the relevant Portfolio may adversely affect the relevant Portfolio's value.

There are also uncertainties under the applicable PRC tax laws on the treatment of income tax and other tax categories payable in respect of trading in China Interbank Bond Market by eligible foreign institutional investors via Bond Connect. There is also the possibility of such laws being changed and taxes being applied retrospectively. Hence it is uncertain as to the Portfolios' tax liabilities for trading in China Interbank Bond Market via Bond Connect.

**Sustainability Risk Assessment**

Sustainability risk is defined as "an ESG event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment". The result of the sustainability risk assessment across the various asset classes are below.

**Equity, Bond, Absolute Return and Extended Alpha Portfolios:** All Equity, Bond, Absolute Return and Extended Alpha Portfolios are exposed to sustainability risk. These Portfolios are potentially (rather than actually) exposed to ESG events or conditions that, if occurring, could cause a material negative impact on the value of the investment.

**Specialist Portfolio:** CT (Lux) Enhanced Commodities is exposed to sustainability risk. The Portfolio is potentially exposed to ESG events or conditions that, if occurring, could cause a material negative impact on the value of the investment.

**Asset Allocation Portfolios:** All Asset Allocation Portfolios are exposed to sustainability risk. These Portfolios are potentially exposed to ESG events or conditions that, if occurring, could cause a material negative impact on the value of the investment.

**Sustainability Risk Integration**

For all Portfolios, the Investment Managers consider sustainability risk when assessing the suitability of securities for investment, and such risks are monitored on an ongoing basis. The following disclosures describe how Columbia Threadneedle's responsible investment policies are applied to mitigate such risks across the various asset classes.

**Sustainability Risk Integration: Equity, Bond, Absolute Return and Extended Alpha Portfolios**

The relevant Investment Manager considers a range of sustainability related risks in the investment decision-making process, to the extent that it is possible to do so, by incorporating an issuer's responsible investment practices and risks in the research available for a Portfolio's portfolio management team. This research is systematically incorporated into the Investment Manager's ratings and tools, for use by the portfolio management team when considering the Portfolio's investment objective, risk within the portfolio, and the implications for ongoing monitoring of holdings.

Responsible investment factors considered by the Investment Manager's research analysts and personnel include assessment of exposure to - as well as management of - ESG risks including those relating to climate change, and instances of involvement in operational controversies. For example, when evaluating an issuer's overall exposure to climate risk, research personnel may consider the implications of an issuer's transition away from carbon-intensive activities and its ability to adapt accordingly, as well as the issuer's potential exposure to the physical risks of climate change, arising from its operations, supply chain or market risks. Issuer-level analysis focuses on material, industry relevant ESG factors, offering the Investment Manager insight into the quality of a business, as well as its leadership, focus and operating standards assessed through an ESG lens. The Investment Manager incorporates this and other external research into ESG ratings and reports via tools it has developed for that purpose and utilizes such information when making investment decisions for the Portfolio.

Further, as applicable, the Investment Manager's research considers any flags around issuers' operations in accordance with international standards such as the UN Global Compact, the International Labour Organisation core labour standards and the UN Guiding Principles for Business and Human Rights. These factors may provide insight into the effectiveness of the risk management oversight of an issuer's sustainability practices and external impacts.

The Investment Manager may also seek to manage sustainability risks and impacts of an issuer through its stewardship efforts, and where appropriate, through its exercise of proxy voting rights. In accordance with applicable law, the Portfolio's portfolio management and responsible investment analysts may determine to engage an issuer in dialogue regarding its sustainability risk management practices.

**Sustainability Risk Integration: CT (Lux) Enhanced Commodities**

The Investment Manager integrates sustainability risk into the investment decision-making process, seeking to manage or avoid the types of risk that can arise within the asset class. The integrated approach is comprised of the following elements:

**Type of exposure:** Investments are made in commodity derivatives as this enables the Investment Manager to gain exposure to the asset class while mitigating the sustainability risks associated with direct, physical or real asset exposures.

**Exclusions:** The Investment Manager recognises that some classes of commodities are more exposed to sustainability issues than others and does not invest in those where particularly sensitive issues commonly arise, such as coal, tobacco, palm oil and diamonds.

**Choice of benchmark:** The Investment Manager uses the Bloomberg Commodity Index (BCOM) as the benchmark for CT (Lux) Enhanced Commodities as it is evenly diversified across sectors and avoids excessive exposure to fossil fuels.

**Liquidity:** The liquid nature of the chosen benchmark also assists the Investment Manager in managing risks associated with investments being made in smaller, more illiquid commodity markets, which could give rise to distortions or impacts on pricing.

**Positive inclusion:** Investment in off-benchmark commodities is subject to a positive inclusion review for sustainability risk and must be positively approved prior to inclusion within the strategy.

**Thematic research and reviews:** Research capabilities and insights across macro, fundamental, thematic and responsible investment factors are leveraged to inform the strategy and investment process.

**Counterparty screening:** All approved counterparties are subject to a sustainability risk review where they are screened against responsible investment factors including internationally accepted standards such as the UN Global Compact, International Labour Organisation core labour standards and the UN Guiding Principles on Business and Human Rights.

**Sustainability Risk Integration: Asset Allocation Portfolios**

Within the Asset Allocation Portfolios, there are a number of types of underlying investments including but not limited to funds managed by Columbia Threadneedle Investments and its affiliates, passive strategies managed by third parties, and direct holdings. Individual Portfolios invest in a variety of these dependent on the Portfolio's investment objective. For all such Portfolios, consideration of sustainability risk is integrated into selection of the underlying investments, be they direct or through other funds, and at the overall Portfolio level.

Where Portfolios invest in other funds managed by affiliates of the Investment Manager, the process for managing sustainability risk at the Portfolio level is as described above (see Sustainability Risk Integration for each underlying asset class).

Where Portfolios gain exposure to securities directly, rather than through other funds, integration of sustainability risk is considered in security selection in the same way as described above for Equity Portfolios and Bond Portfolios. The Portfolios do not invest directly in commodities or property.

For the Asset Allocation Portfolios, the aggregate sustainability risk exposure across the underlying funds is measured and collated at the Portfolio level and then compared against the Portfolio's actual asset allocation at the end of the month for comparison purposes. To explain this, if a Portfolio at the end of the month has invested in three different internal funds (UK equities, US equities and UK Corporate Bonds) in equal proportions, then the comparison will be the collated internal fund sustainability risk versus the underlying funds' benchmarks (so in this case FTSE All-Share Index, S&P 500 Index and iBoxx Sterling Non-Gilts) for comparison purposes.

# THE SICAV

The SICAV is an investment company organised as a "*société d'investissement à capital variable*" in the Grand Duchy of Luxembourg under the Companies Law and qualifies as a UCITS under the 2010 Law. The SICAV, including all its Portfolios, is considered as a single legal person. However, pursuant to article 181(5) of the 2010 Law, each Portfolio corresponds to a distinct part of the assets and liabilities of the SICAV and shall therefore be liable only for its own debts and obligations.

The SICAV was incorporated on 10 February 1995 for an unlimited period and may be liquidated by decision of its Shareholders in an extraordinary general meeting. The Articles were first published in the RESA on 31 March 1995 and were last amended effective on 20 November 2023. The SICAV was formerly known as *American Express Funds* and subsequently as *World Express Funds I and Threadneedle (Lux)*. The SICAV's principal and registered office is at 49, Avenue J.F. Kennedy, Luxembourg, Grand Duchy of Luxembourg.

The SICAV is registered under the number R.C.S. Luxembourg B 50 216 at the Register of Commerce and Companies at the District Court of Luxembourg where the Articles are available for inspection and where copies thereof may be obtained upon request.

The corporate capital of the SICAV shall be at all times equal to the total net assets of all of the Portfolios of the SICAV. The minimum share capital of the SICAV shall be the equivalent in U.S. Dollars of 1,250,000 Euro.

The Directors are responsible for the overall administration, control and management of the SICAV and each of its Portfolios. The Directors are listed below together with their principal occupations:

Claude KREMER
Independent non-executive Director
Luxembourg
Grand Duchy of Luxembourg

Annemarie ARENS
Independent non-executive Director
Gonderange Grand Duchy of Luxembourg

Joseph LaROCQUE
Independent non-executive Director
Maryland
United States of America

Thomas SEALE
Independent non-executive Director
Bereldange
Grand Duchy of Luxembourg

Tina WATTS
EMEA Head of Fund Services and CASS
Columbia Threadneedle Investments
London
United Kingdom

The Auditor is PricewaterhouseCoopers Assurance, *société coopérative*, 2, rue Gerhard Mercator, B.P. 1443, L-1014 Luxembourg.

The SICAV may, with the consent of the Shareholders expressed in the manner provided for by article 450-3 of the Companies Law be liquidated and the liquidator authorised to transfer all assets and liabilities of the SICAV to a Luxembourg UCITS or to a UCITS of another EU member state, in exchange for the issue to Shareholders in the SICAV of shares or units of such UCITS proportionate to their shareholdings in the SICAV. Any liquidation of the SICAV will be carried out in accordance with Luxembourg law and each Shareholder shall be entitled to a *pro rata* share of the liquidation proceeds corresponding to his shareholding in each Class of Shares of each Portfolio. Monies available for distribution to Shareholders in the course of the liquidation that are not claimed by Shareholders will, at the close of liquidation, be deposited at the *Caisse de Consignation* in Luxembourg pursuant to article 146 of the 2010 Law.

If the capital of the SICAV falls below two-thirds of the minimum capital of the equivalent in U.S. Dollars of 1,250,000 Euro, the Directors must submit the question of the dissolution of the SICAV to a general meeting of Shareholders convened to be held within 40 days and for which no quorum shall be prescribed, and a decision to dissolve the SICAV may be taken by a simple majority of the affirmative votes of the Shareholders present or represented.

If the capital of the SICAV falls below one quarter of the minimum capital stated above, the Directors must submit the question of the dissolution of the SICAV to a general meeting of Shareholders convened to be held within 40 days and for which no quorum shall be prescribed, and a decision to dissolve the SICAV may be taken by the Shareholders owning one quarter of the Shares represented at the meeting.

The Shares of each Portfolio have no par value. Each Share is entitled to one vote at all general meetings of Shareholders irrespective of its Net Asset Value, subject to the limitations imposed by the Articles and by applicable Luxembourg laws and regulations. The Board may suspend the voting rights attached to shares held by a Shareholder who is in breach of the Articles or of legal or regulatory requirements or otherwise adversely affects or prejudices the SICAV or who could in the Board's judgement, otherwise cause the SICAV or any Portfolio to suffer disadvantage. In particular, the SICAV may not recognise the vote of any United States Person. See "Restrictions on Ownership".

The Shares of each Portfolio when issued will have no preferential or preemptive rights. There are and will be no outstanding options or special rights relating to any Shares. The Shares are freely transferable, subject to the restrictions set forth below under "Restrictions on Ownership".

Shares of each Portfolio are presently issued in non-certificated registered form, including fractional entitlements, except where a Shareholder specifically also asks for a physical Share certificate to be issued, in which case such Shareholder shall bear the associated costs. Shares are issued to a thousandth of a share (3 decimal places).

Fractional shares receive their pro rata portion of any dividends, reinvestments, and liquidation proceeds, but do not carry voting rights.

Separate Portfolio or Class meetings may be held on certain matters materially affecting the interests of the relevant Shareholders, at which only the Shares of the relevant Portfolio and/or Class will vote.

In cases where an investor subscribes Shares in the Portfolio through an intermediary investing into the Portfolio in its own name but on behalf of the investor, investors' rights to indemnification in the event of net asset value errors/non-compliance with the investment rules applicable to a Portfolio may be affected and only exercisable indirectly.

## THE MANAGEMENT COMPANY

The SICAV has designated Threadneedle Management Luxembourg S.A. to serve as its designated management company in accordance with the 2010 Law, pursuant to a Management Company Services Agreement dated as of 31 October 2005. Under this Agreement, the Management Company provides investment management, administrative and marketing services to the SICAV, subject to the overall supervision and control of the Directors.

The Management Company, formerly known as American Express Bank Asset Management Company (Luxembourg) S.A. and subsequently Standard Chartered Investments (Luxembourg) S.A, was organised on August 24, 2005 as a public limited company (*société anonyme*) for an unlimited period of time under the laws of the Grand Duchy of Luxembourg. Its articles of incorporation were published in the RESA on 22 September 2005 and were last amended on 31 October 2020. It is registered under the number R.C.S. Luxembourg B 110242 at the Register of Commerce and Companies at the District Court of Luxembourg. Its share capital amounts to Euro 2,519,100 fully paid-up. The Management Company is indirectly owned by and is an indirect subsidiary of Ameriprise Financial, Inc. It is registered on the official list of Luxembourg management companies governed by Chapter 15 of the 2010 Law.

The Management Company is in charge of the day-to-day operations of the SICAV. The board of directors of the Management Company is composed of:

Florian ULEER, Head of Europe and Middle East Distribution;

Peter STONE, Chief Operating Officer, Global Alternatives;

Marc C. ZEITOUN, Chief Operating Officer, North America Distribution;

Jill GRIFFIN, Head of Luxembourg Business;

Michael FISHER, Head of Global Operations & Investor Services, EMEA.

The conducting persons of the Management Company are:

Linda ALIOUAT, Head of Risk Management, Threadneedle Management Luxembourg S.A.;

Jacek BERENSON, Conducting Officer – Portfolio Management, Threadneedle Management Luxembourg S.A.;

Claire MANIER, Managing Legal Counsel & Compliance Officer, Threadneedle Management Luxembourg S.A.;

Aline ZANETTE, Conducting Officer – Distribution and Operations, Threadneedle Management Luxembourg S.A.;

Jill GRIFFIN, Head of Luxembourg Business, Columbia Threadneedle Investments;

Theodore ANDERSEN, Conducting Officer, Anti Money Laundering, Threadneedle Management Luxembourg S.A.

In fulfilling its responsibilities set forth by the 2010 Law and the Management Company Services Agreement, it is permitted to delegate all or a part of its functions and duties to third parties, provided that it retains responsibility and oversight over such delegates. The appointment of third parties is subject to the approval of the SICAV and the Regulatory Authority. The Management Company's liability shall not be affected by the fact that it has delegated its functions and duties to third parties.

The Management Company has delegated the following functions to third parties: investment management, transfer agency and administration and marketing and distribution. See "Investment Management Arrangements", "Distribution Arrangements" and "Service Providers" below.

The Management Company shall at all times act in the best interests of the SICAV and its Shareholders and according to the provisions set forth by the 2010 Law, the Prospectus and the Articles.

The Management Company Services Agreement provides for a term of unlimited duration and may be terminated by either party upon three months' prior written notice.

**Remuneration**

The Management Company, as part of Columbia Threadneedle Investments EMEA Region, shall apply remuneration policies and practices for identified staff in compliance with the UCITS V Directive (2014/91/EU) ("**UCITS V**") and regulatory requirements. Further details on the Remuneration Policy can be found at www.columbiathreadneedle.com. The up to date details of the remuneration policy shall include, but are not limited to, a description of how remuneration and benefits are calculated and the identities of persons responsible for awarding the remuneration and benefits, including the composition of the remuneration committee.

The remuneration policy is consistent with and promotes sound and effective risk management and does not encourage risk taking which is inconsistent with the risk profiles, rules or instruments of incorporation:

- the remuneration policy is in line with the business strategy, objectives, values and interests of the Management Company and of the investors, and includes measures to avoid conflicts of interest. The Management Company has full discretion as to whether any variable remuneration is awarded in compliance with the Remuneration Policy;

- where remuneration is performance-related, the total amount of remuneration is based on a combination of the assessment as to the performance of the individual and of the business unit and as to their risks and of the overall results of the Management Company when assessing individual performance, taking into account financial and non-financial criteria. In particular, employees will not be eligible to receive an incentive award if at any point during the relevant performance year, and the period from the end of the performance year until the award payment date, the employee has been found, not to have met the Management Company's standards of performance and conduct;

- the assessment of performance is set in a multi-year framework with stock awards set with deferral rates in accordance applicable regulation.

Further details on the Remuneration Policy can be found at Columbia Threadneedle Investments - Remuneration Policy EMEA.pdf. A paper copy of the Remuneration Policy is available free of charge upon request.

## INVESTMENT MANAGEMENT ARRANGEMENTS

Subject to the overall responsibility of the Directors, the Management Company will provide or procure for each Portfolio investment advisory and discretionary investment management services, pursuant to the provisions of the Management Company Services Agreement.

In order to implement the investment policies of each Portfolio, the Management Company has delegated the management of the assets of each Portfolio to the Investment Managers listed below pursuant to an Investment Management agreement with each Investment Manager:

- Columbia Management Investment Advisers, LLC, 290 Congress Street, Boston, MA 02210, United States
- Threadneedle Asset Management Limited, Cannon Place, 78 Cannon Street, London EC4N 6AG, United Kingdom
- Threadneedle Investments Singapore (Pte.) Limited, 3 Killiney Road, #07-07 Winsland House 1, Singapore 239519
- Thames River Capital LLP, Cannon Place, 78 Cannon Street, London EC4N 6AG, United Kingdom

The Investment Managers provide the Management Company with management or advisory services in relation to Portfolio assets and also provide investment research and credit analysis concerning prospective and existing Portfolio investments. Each Investment Manager has day-to-day investment responsibility in respect of the relevant Portfolios. The Management Company is responsible for paying the fees of such Investment Managers as set forth in the section "Fees and Expenses".

An Investment Manager has the power to (fully or partially) delegate, at its own expense and while maintaining full responsibility, the investment management functions in relation to the relevant Portfolio(s) for which it has been appointed as Investment Manager to other Investment Managers (i.e. Sub-Investment Managers).

Information about the Investment Manager(s) responsible for the management of each relevant Portfolio can be found on the website: https://www.columbiathreadneedle.com/en/columbia-threadneedle-investment-managers/.

The Investment Managers are each indirect wholly-owned subsidiaries of Ameriprise Financial, Inc. ("**Ameriprise**"), a company incorporated in the United States.

While the Management Company is at all times subject to the direction of the Directors, the Management Company Services Agreement and relevant Investment Management agreement provide that the Management Company or the Investment Manager appointed by it is responsible for the management of the relevant Portfolios. Therefore, the responsibility for making decisions to buy, sell or hold a particular security rests with the Management Company or the Investment Managers appointed by it, subject to the control, supervision, direction and instruction of the Directors.

## CONFLICTS OF INTEREST

There are potential sources of conflicts of interest between the SICAV and/or the Management Company and the Shareholders and the Ameriprise Group and any persons appointed as Investment Manager (each an "**Interested Party**"). These include the following:

(i) an Interested Party may purchase and sell for its own account securities in which the SICAV may also invest. In addition, the Management Company in its normal course may purchase and sell assets for the SICAV from and to an Interested Party on an arm's length basis and may give investment advice in respect of, or manage third-party funds that are invested in, the same securities in which the SICAV will invest;

(ii) an Interested Party may lend money to the companies or countries in which the SICAV invests. Credit decisions that an Interested Party makes in respect of such companies or countries could have an impact on the market value of the securities in which the SICAV invests. Furthermore, an Interested Party's position as a lender may be senior to the securities in which the SICAV invests;

(iii) an Interested Party may also engage in other activities involving or affecting the securities in which the SICAV invests. In particular, an Interested Party may be involved in origination of transactions concerning such securities, underwriting such securities and acting as broker-dealer in respect of such securities. In addition, an Interested Party may perform other services for portfolio companies and receive fees, commissions and other remuneration therefor;

(iv) in conjunction with its various activities, an Interested Party may come into possession of confidential information that could, if known to the public, affect the market value of the securities in which the SICAV will invest. An Interested Party may not disclose such information to the SICAV or use such information for the benefit of the SICAV.

In effecting foreign exchange or in making any purchase or sale of any securities or other assets for the SICAV, an Interested Party may act as a counterparty, principal agent or broker in the transaction and may be separately compensated in that capacity.

## PORTFOLIO TRANSACTIONS

The Management Company's best execution policy sets out the basis upon which it would effect transactions and place orders in relation to the Company whilst complying with its obligations under the CSSF Regulation 10-4, Article 28, in order to obtain the best possible result for the Company. However, as the Management Company has delegated the management of the assets of each Portfolio to the Investment Managers listed in the section 'Investment Management Arrangements', the best execution policies of those respective Investment Managers may differ to the aforementioned policy. The aforementioned policy applies more specifically to those affiliates of the Management Company. Details of this best execution policy are available on the Management Company's website at www.columbiathreadneedle.com.

The SICAV is under no obligation to deal with any broker or group of brokers in respect of the execution of transactions in Portfolio securities. Transactions may be effected through brokers and dealers that are affiliated with Investment Managers. Such transactions may be subject to a commission or dealer mark-up, which may not be the lowest commission or spread available.

Brokers who provide supplemental investment research to the Management Company may receive orders for transactions by the SICAV. Information so received will be in addition to and not in lieu of the services required to be performed by the Management Company under the Management Company Services Agreement, and the expenses of the Management Company will not necessarily be reduced as a result of the receipt of such supplemental information.

Securities held by a Portfolio also may be held by another Portfolio or by other funds or investment advisory clients for which the Management Company or Investment Managers or their affiliates act as an advisor. Because of different objectives or other factors, a particular security may be bought for one or more such clients when one or more clients are selling the same security. If the Management Company or Investment Manager is considering the purchase or sale of a security for a Portfolio or for another company for which it acts as management company or investment manager, transactions in such securities will be made, insofar as feasible, in a manner deemed by the Management Company or Investment Manager to be equitable to both the Portfolio and the SICAV. There may be occasions, however, when such purchases or sales of securities have an adverse effect on the Portfolio or on other clients of the Management Company or Investment Manager.

## NET ASSET VALUE DETERMINATION

The Net Asset Value per Share of each Class of each Portfolio is calculated as of each Valuation Date.

The Net Asset Value per Share is determined by or at the direction of the SICAV and made available at the registered office of the SICAV. The Net Asset Value per Share is stated in the currency in which the relevant Class of such Portfolio's Shares is denominated as well as in certain other currencies as may be determined from time to time by the Directors.

The assets of the SICAV will be valued as follows:

(i) the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued as aforesaid and not yet received shall be deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof shall be arrived at after making such discount as the SICAV may consider appropriate in such case to reflect the true value thereof;

(ii) Transferable Securities, Money Market Instruments and any financial assets listed or dealt in on a stock exchange of an Other State or on a Regulated Market, or on any Other Regulated Market of a Member State or of an Other State, are generally valued at their last exchange price in the relevant market at the time of closure of the market, or any other price deemed appropriate by the Directors. Fixed income securities not traded on such markets are generally valued at the last available price or yield equivalents obtained from one or more dealers or pricing services approved by the Directors, or any other price deemed appropriate by the Directors;

(iii) if such prices are not representative of their value, such securities are stated at market value or otherwise at the fair value at which it is expected they may be resold, as determined in good faith by or under the direction of the Directors;

(iv) Money Market Instruments (or other instruments in line with market convention in the jurisdiction in which the instrument is held) with a remaining maturity of 90 days or less will be valued by the amortised cost method, which approximates market value. Under this valuation method, the relevant Portfolio's investments are valued at their acquisition cost or the last market value prior to the 90 day period commencing (where an instrument at purchase date originally had more than 90 days to maturity) and adjusted for amortisation of premium or accretion of discount rather than at market value;

(v) units or shares of open-ended UCI will be valued at their last determined and available net asset value or, if such price is not representative of the fair market value of such assets, then the price shall be determined by the SICAV on a fair and equitable basis. Units or shares of a closed-ended UCI will be valued at their last available stock market value;

(vi) the liquidating value of futures, forward or options contracts not traded on a stock exchange of an Other State or on Regulated Markets, or on Other Regulated Markets shall mean their net liquidating value determined, pursuant to the policies established by the Directors, on a basis consistently applied for each different variety of contracts. The value of futures, forward or options contracts traded on a stock exchange of an Other State or on Regulated Markets, or on other Regulated Markets shall be based upon the last available settlement or closing prices as applicable to these contracts on a stock exchange or on regulated markets, or on other regulated markets on which the particular futures, forward or options contracts are traded on behalf of the SICAV; provided that if a future, forward or options contract could not be liquidated on the day with respect to which assets are being determined, the basis for determining the liquidating value of such contract shall be such value as the Directors may deem fair and reasonable;

(vii) interest rate swaps will be valued on the basis of their market value established by reference to the applicable interest rate curve;

(viii) credit default swaps and total/excess return swaps will be valued at fair value under procedures approved by the Directors. As these swaps are not exchange-traded, but are private contracts into which the SICAV and a swap counterparty enter as principals, the data inputs for valuation models are usually established by reference to active markets. However it is possible that such market data will not be available for credit default swaps and total/excess return swaps near the Valuation Date. Where such markets inputs are not available, quoted market data for similar instruments (e.g. a different underlying instrument for the same or a similar reference entity) will be used provided that appropriate adjustments be made to reflect any differences between the credit default swaps and total/excess return swaps being valued and the similar financial instrument for which a price is available. Market input data and prices may be sourced from exchanges, a broker, an external pricing agency or a counterparty.

If no such market input data are available, credit default swaps and total/excess return swaps will be valued at their fair value pursuant to a valuation method adopted by the Directors which shall be a valuation method widely accepted as good market practice (*i.e.* used by active participants on setting prices in the market place or which has demonstrated to provide reliable estimate of market prices) provided that adjustments that the Directors may deem fair and reasonable be made. The SICAV's auditor will review the appropriateness of the valuation methodology used in valuing credit default swaps and total/excess return swaps. In any way the SICAV will always value credit default swaps and total/excess return swaps on an arm's-length basis;

(ix) All other swaps will be valued at fair value as determined in good faith pursuant to procedures established by the Directors;

(x) all other securities, instruments and other assets will be valued at fair market value, as determined in good faith pursuant to procedures established by the Directors;

(xi) assets denominated in a currency other than that in which the relevant Net Asset Value will be expressed, will be converted at the relevant foreign currency spot rate on the relevant Valuation Date. In that context account shall be taken of hedging instruments used to cover foreign exchange risks.

The SICAV constitutes one single collective investment scheme with separate Portfolios. Each Portfolio, however, is deemed a separate entity vis-à-vis third parties and creditors and is exclusively liable for its own debts and obligations.

Notwithstanding the above, pursuant to general guidelines and policies adopted by the Directors from time to time, if the Directors consider that another method of valuation would more accurately reflect the value at which it is expected that the securities or other investments may be resold, the method used to value such securities or other investments, whether on each Valuation Date, or on any particular Valuation Date, may be adjusted by or under the direction of the Directors, in their sole and absolute discretion.

The Net Asset Value per Class of each Portfolio is determined by dividing the value of the total assets of the Portfolio properly allocable to such Class of Shares, less the liabilities of such Portfolio properly allocable to such Class of Shares by the total number of Shares of such Class outstanding on the Valuation Date.

If the Net Asset Value per Share is certified by an authorised officer or representative of the SICAV, any such certification shall be conclusive except in the case of manifest error.

Interest receivable on debt securities held by a Portfolio is accrued daily and dividends receivable are accrued as of the relevant ex-dividend dates.

## NET ASSET VALUE PUBLICATION

The Net Asset Value per Class of each Portfolio and the offering and redemption prices shall be available at the registered office of the SICAV. The SICAV may arrange for the publication of this information in leading financial newspapers or as otherwise required by applicable law. The SICAV cannot accept any responsibility for any error or delay in publication or for non-publication of a Net Asset Value.

## DILUTION ADJUSTMENT

The Portfolios may suffer reduction of the Net Asset Value per Share due to dealing spreads, transaction costs and tax charges that arise when purchases and sales of underlying investments are undertaken by the Investment Manager to accommodate cash inflows and outflows; this is known as "dilution". A dilution adjustment may be applied to protect the Shareholders of the Portfolios by countering the impact of dilution (the "**Dilution Adjustment**"). If the net capital activity (including subscriptions, redemptions and conversions into a given Portfolio) on a given Valuation Date exceeds the threshold set by the Management Company from time to time for that Portfolio, the Net Asset Value of the Portfolio may be adjusted upwards or downwards to reflect the net inflows and net outflows respectively.

The Net Asset Value per Share of each Share Class in the Portfolio is calculated separately but any Dilution Adjustment will have an identical effect on the Net Asset Value per Share of each Share Class of the Portfolio. The amount of Dilution Adjustment will be set by the Management Company to reflect the estimated dealing spreads, transaction costs and tax charges that may be incurred by the Portfolio; these costs can vary with market conditions and the portfolio composition. The Dilution Adjustment may therefore be amended from time to time. Such Dilution Adjustments may vary from Portfolio to Portfolio and between daily net inflows and outflows but will not exceed 2% of the original Net Asset Value per Share. A periodic review is undertaken in order to verify the appropriateness of the Dilution Adjustments being applied. In the usual course of business the application of Dilution Adjustment will be triggered mechanically and on a consistent basis, however the Management Company reserves the right to make a discretionary Dilution Adjustment if, in its opinion, it is in the interests of existing Shareholders to do so, including in the event of exceptional circumstances. Such exceptional circumstances include, but are not limited to, periods of elevated market volatility, and periods of depressed market liquidity.

The Dilution Adjustment may be applied across all Portfolios with the exception of Enhanced Commodities.

Estimates of the amount of Dilution Adjustment based on securities held in each Portfolio and market conditions will be published on the website www.columbiathreadneedle.com.

## FEES AND EXPENSES

The fees and expenses incurred in the operation of the SICAV and defined below (hereafter the "**Operating Expenses**", "**Asset Management Fee**" or "**Portfolio Charges**") are fixed at the rates shown in Appendices C to T to this

Prospectus. These are accrued daily based on the Net Asset Value of the relevant Share Class in the relevant Portfolio. The Operating Expenses and the Asset Management Fee are paid out of the assets of the relevant Portfolio and the Initial Sales Charge and Exchange Fee is paid directly by investors.

**Operating Expenses**

The Operating Expenses include, but are not limited to, the following:

- fees and charges of the Depositary, Domiciliary, Administrative and Paying Agent, and the Registrar and Transfer Agent
- fees of any local paying agents
- taxes and governmental charges including Luxembourg subscription tax (*taxe d'abonnement*)
- registration fees and expenses in various jurisdictions
- listing fees
- documentation costs, such as preparing, printing, translating, and distributing the prospectus, PRIIPs KIDs, and shareholder reports and notices
- accounting and pricing costs (including the calculation of Net Asset Value per Share)
- expenses of the issue, exchange and redemption of Shares
- expenses for legal and auditing services
- formation expenses incurred in connection with the setting-up of new Portfolios
- fees paid to independent directors, and expenses of the directors and the Investment Managers of the SICAV (and any of their officers) related to their attendance at board or shareholder meetings
- insurance
- litigation and other extraordinary or non-recurring expenses
- all other expenses properly payable by the SICAV

The Operating Expenses are calculated on each Business Day for each Portfolio and Share Class and paid monthly in arrears to the Management Company. The Management Company will bear the excess of any Operating Expenses above the annual rate. Conversely the Management Company will be entitled to retain any amount by which the annual rate of Operating Expenses exceeds the actual expenses incurred by the SICAV.

Each Portfolio and Share Class pays all Operating Expenses it incurs directly. For each Share Class whose currency is different from the Base Currency of the Portfolio, all costs associated with maintaining the separate Share Class currency (such as currency hedging and foreign exchange costs) will be charged solely to that Share Class to the extent practicable.

The Management Company will charge a fixed annual fee of 0.025% of the Net Asset Value of each Hedged Share Class as a charge for currency hedging services provided to that Share Class. This charge will be calculated and accrued on each Business Day and paid quarterly in arrears to the Management Company. For the avoidance of doubt, the fixed hedging charge is in addition to the Operating Expenses and other fees payable by each Share Class and is specifically intended to cover the costs associated with implementing and maintaining the currency hedging strategy for Hedged Share Classes.

**Asset Management Fee**

Furthermore, the Management Company is entitled to receive an Asset Management Fee as more fully described in Appendices C, D, E, F, G, H, I, J, K, L, N, O, P, Q, S, and T herein, which are accrued daily and paid monthly. An Asset Management Fee is not payable for X Shares and Class 4 Shares. Also, in relation to certain Portfolios, the Management Company is entitled to receive a performance fee as more fully described in the section below entitled "Performance fee". For the avoidance of doubt, Operating Expenses do not include either Asset Management Fees or performance fees which are separate and distinct.

The Management Company is responsible for paying ongoing investment management fees to the Investment Managers out of the Asset Management Fee. The actual Asset Management Fee charged during any semi-annual period to each Class within each Portfolio will be disclosed in the annual or semi-annual reports covering such period. Investors may also obtain a schedule of the Asset Management Fee currently in effect upon request at the registered offices of the SICAV, the Management Company or the sub-distributors.

**Portfolio Charges – Institutional Share Classes – I Shares, L Shares, N Shares, X Shares, Class 2 Shares, Class 4 Shares, Class 9 Shares**

There will be no initial sales charges applicable to any of the Institutional Share Classes. An Asset Management Fee will be accrued daily and paid monthly for the I Shares as disclosed in Appendix F below, for L Shares as disclosed in Appendix G, for N Shares as disclosed in Appendix I, for Class 2 Shares as disclosed in Appendix P, for Class 9 Shares

as disclosed in Appendix T. There will be no initial sales charges or Asset Management Fee for the X Shares and Class 4 Shares as these Classes are only available to Eligible Investors.

**Commission sharing arrangements**

The Management Company and certain Investment Managers may enter into commission sharing arrangements with broker-dealers under which certain business services are obtained from such broker-dealers directly or from third parties and are paid for by the broker-dealers out of the commissions they receive on transactions for the SICAV. Consistent with obtaining best execution, brokerage commissions on portfolio transactions for the SICAV may be specifically allocated by the Management Company or each relevant Investment Manager to broker-dealers in consideration of any research services rendered as well as for services rendered in the execution of orders by such broker-dealers. Additional information on each Investment Manager's practices with respect to commission sharing arrangements is detailed in the section of this Prospectus with the heading "Investment Management Arrangements" above.

Any commission sharing arrangement entered into by the Management company or an Investment Manager will operate under the following conditions: (i) the Management Company or the Investment Manager will act at all times in the best interest of the SICAV and of its Shareholders when entering into commission sharing arrangements; (ii) the services provided will be in direct relationship to the activities of the Management Company or Investment Manager; (iii) brokerage commissions on portfolio transactions for the SICAV will be allocated by the Management Company or the Investment Manager to broker-dealers that are entities and not to individuals; (iv) commission sharing arrangements are not a determining factor in the selection of the broker-dealers; (v) the Management Company or the Investment Manager will provide reports to the Directors with respect to commission sharing arrangements including the nature of the services it receives; (vi) neither the Management Company, the Investment Manager nor any of their connected persons may retain cash or other rebates from broker-dealers; (vii) the goods or services received are of demonstrable benefit to the Shareholders.; and (viii) periodic disclosure will be made in the SICAV's annual report in the form of statement describing any such commission sharing arrangements, including a description of the goods and services received. The goods and services received may include: research that can add value to an Investment Manager's decision making process and execution services that enhance the Investment Manager's ability to execute transactions.

**Performance fee**

The Management Company shall receive a performance fee as set forth below with respect to the Share Classes of the Portfolios listed in the table below. Daily provisions shall be set up for the accrual of the performance fee in respect of the performance fee balance (as described below), whereby the amount accrued shall be paid to the Management Company at the end of each calendar year. The Management Company is responsible for paying all or part of the performance fee to the Investment Managers in accordance with their Investment Management agreement. The amount of this performance fee depends on the performance of the Net Asset Value of the relevant Share Class within the relevant Portfolio compared to the performance of the relevant performance index (the "Performance Index", as per the table below). The Performance Index is subject to a minimum rate of return, to ensure that the Portfolios must deliver a minimum positive rate of return for a performance fee to be paid, in the event that the underlying benchmark return is negative. Accruals will only be made when the performance fee balance is positive and the NAV High Water Mark (defined below) is exceeded. In the event of a redemption of Shares, any accrued performance fee attributable to the redeeming Shareholder's holding will be crystallized at the time of the redemption and will be paid at the end of each calendar year.

The performance reference period for each Share Class is the whole life of the Share Class, i.e. from launch until termination.

For the avoidance of doubt, performance of Share Classes includes dividends paid.

| Portfolio | Share Classes | Performance Index | Performance Rate |
|---|---|---|---|
| Pan European Absolute Alpha | A Shares<br>D Shares<br>I Shares<br>Z Shares<br>L Shares | Higher of 3 month Euro Interbank Offered Rate (EURIBOR)[20] plus 1.50%, subject to a minimum of 1.50% | 20% |

[20] The benchmark is provided by the European Money Markets Institute, an administrator included in the ESMA register of benchmark administrators. The Management Company maintains a written plan setting out the actions that will be taken in the event of the benchmark materially changing or ceasing to be provided. This plan is available on request from the Management Company.

The performance of the Pan European Absolute Alpha Portfolio, including the impact of all applicable fees, is compared to the Performance Index.

**NAV High Water Mark:** in respect of each Share Class, the Net Asset Value of a Share of such Share Class as at the last Valuation Date of the last relevant calendar year in which any accrued performance fee was paid If a performance fee has never been paid, the NAV High Water Mark is the inception price of the relevant Share Class. The NAV High Water Mark can only be increased, and cannot be decreased under any circumstances.

The performance fee balance shall be calculated on the difference between the performance of the Performance Index and the performance of the Share Class concerned (the "Daily Difference"):

(i) in the event the Daily Difference is positive, the performance fee balance will increase by an amount in respect of the Daily Difference, at the relevant performance rate;
(ii) if the Daily Difference is negative, the performance fee balance will be reduced by an amount in respect of the Daily Difference, at the relevant performance rate.

If the performance fee balance is positive as at the end of the calendar year, i.e. 31 December, and the NAV High Water Mark has been exceeded, the accrued amount of the performance fee will be paid to the Management Company within the first quarter of the subsequent calendar year. A performance fee shall only be paid to the Management Company if the Net Asset Value of the relevant Share Class exceeds the NAV High Water Mark and the performance fee balance is positive.

If at the end of the calendar year the performance fee balance is negative and the NAV High Water Mark has not been exceeded, such negative amount will be carried forward and the Management Company shall not receive the payment of a performance fee until the amount of the accrued performance fee balance is positive and the NAV High Water Mark has been exceeded, at any subsequent calendar year's end.

If at the end of the calendar year the performance fee balance is negative and the NAV High Water Mark has been exceeded, such negative amount will be carried forward and the Management Company shall not receive the payment of a performance fee until the amount of the accrued performance fee balance is positive and the NAV High Water Mark has been exceeded, at any subsequent calendar year's end.

By way of illustration, the following examples set out the scenarios in which a performance fee may be payable, or not payable. Examples are illustrative only, and are not intended to reflect actual past performance or potential future performance of any Share Class. In these examples, Valuation Date 4 represents the end of the calendar year, at which point a performance fee may be payable if the conditions set out above have been met:

| Valuation Date | NAV High Water Mark | Share Class NAV | Share Class NAV return % | Performance Index | Performance Index return % |
|---|---|---|---|---|---|
| 1 | 10.00 | 10.00 | - | 100 | - |
| 2 | 10.00 | 10.05 | 0.50% | 101 | 1.00% |
| 3 | 10.00 | 11.00 | 10.00% | 103 | 3.00% |
| 4 | 10.00 | 10.90 | 9.00% | 104 | 4.00% |
| 5 | 10.90 | 10.70 | -1.83% | 106 | 1.92% |

**Example 1**
A first Shareholder buys Shares at Valuation Date 1 at the launch NAV of 10.00. The NAV High Water Mark is established at the same level as the launch NAV. At Valuation Date 2 the Share Class NAV has risen to 10.05, a return of 0.50%. As the return of the Performance Index is higher, at 1.00%, no performance fee has been accrued.

**Example 2**
At Valuation Date 3, the Share Class NAV has risen to 11.00, representing a return since Valuation Date 1 of 10%. As this is above the 3.00% return of the Performance Index, a performance fee accrual has been made and the performance fee balance is positive. If the first Shareholder were to sell their Shares at this point, an amount of performance fee proportionate to their holding would be realised and paid to the Management Company.

**Example 3**
A second Shareholder buys Shares at Valuation Date 3, at a Share Class NAV of 11.00. The Share Class NAV is calculated to exclude the performance fee accrual, so if a performance fee is payable in future, this Shareholder is not liable for performance fees accrued prior to Valuation Date 3.

**Example 4**
Valuation Date 4 is the end of the calendar year. The Share Class NAV is 10.90, having returned 9.0% since launch. Having generated performance in excess of the Performance Index, the performance fee balance is positive, and the Share

Class NAV is above the NAV High Water Mark of 10.00. As a result, a performance fee is realised and paid to the Management Company. The NAV High Water Mark is reset to 10.90, and the performance fee balance is reset to zero.

**Example 5**
The first Shareholder sells their Shares at an NAV of 10.70. This is below the NAV High Watermark of 10.90, and as the Share Class has underperformed the Performance Index, there is no positive performance fee balance. As a result, the Shareholder is not liable to pay any performance fee for the period between Valuation Date 4 and Valuation Date 5 when the Shares are sold.

In the event that a Portfolio or a Share Class is liquidated or a Portfolio or Share Class becomes dormant, any outstanding performance fee accrual shall be realised and payable to the Management Company. Thereafter, when new Shareholders have invested in such a Portfolio or Share Class, the performance fee balance will be reset.

There is no maximum value on the performance fee that could be taken.

Actual past performance information is available on our website below by searching for your particular Portfolio and selecting your Share Class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

## DISTRIBUTION ARRANGEMENTS

The Management Company has also been appointed to provide distribution and marketing services pursuant to the Management Company Services Agreement. The Management Company may enter into contractual arrangements with financial institutions for the distribution of Shares outside the United States. Shares also may be purchased directly from the SICAV on the same pricing and charge basis as if obtained through the Management Company. The Shares have not been registered under the Securities Act, as amended, and may not be sold in the United States or to United States Persons.

The Management Company may re-allow discounts to sub-distributors with whom it has agreements and are entitled to the balance over such discounts. The Management Company and the sub-distributors may further re-allow the total or some part of the agreed discount to other parties, such as certain recognised financial intermediaries. The Management Company may, but is not obligated to, pay out of its assets for certain distribution and other expenses related to any Class of Shares.

The Management Company will provide a nominee service and may appoint additional nominees (each a "**Nominee**") to investors purchasing Shares of any Portfolio. Investors in a Portfolio may elect to make use of such nominee service pursuant to which the Nominee will hold the Shares of such Portfolio in its name for and on behalf of the investors who shall be entitled to at any time claim direct title to the Shares and who, in order to empower the Nominee to vote the Shares at any general meeting of Shareholders, shall provide the Nominee with specific or general voting instructions to that effect.

Only registered Shareholders may submit redemption orders directly to the SICAV. Investors whose Shares are maintained in the name of a Nominee must submit an order through the Nominee since the Nominee is recognised by the Management Company as the owner of record of the Shares. Beneficial owners of Shares held by a Nominee may at all times request the SICAV to register such Shares into their own name, subject to prior notification to the Nominee and documentation of the identity of such owners to be provided to the Registrar and Transfer Agent.

The SICAV draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the SICAV, notably the right to participate in general shareholders' meetings, if the investor is registered himself and in his own name in the shareholders' register of the SICAV. In cases where an investor invests in the SICAV through an intermediary investing into the SICAV in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the SICAV. Investors are advised to take advice on their rights.

## LUXEMBOURG ANTI-MONEY LAUNDERING REGULATIONS

In an effort to deter money laundering, the SICAV, the Management Company, sub-distributors and the Registrar and Transfer Agent must comply with all applicable international and Luxembourg laws and circulars regarding the prevention of money laundering and in particular with Luxembourg law dated 12 November 2004 against money laundering and terrorism financing, as amended. To that end, the SICAV, the Management Company, sub-distributors and the Registrar and Transfer Agent may request information necessary to establish the identity of a potential investor

and the origin of subscription proceeds. Failure to provide documentation may result in a delay or rejection by the SICAV of any subscription or exchange or a delay in payout of redemption of Shares by such investor.

## SHARE CLASSES

In order to meet the requirements of various types of shareholders, the SICAV may offer different Share Classes within each Portfolio. Unless otherwise specified elsewhere in this Prospectus, all the Portfolios may offer A Shares, D Shares, I Shares, L Shares, M Shares, N Shares, S Shares, T Shares, W Shares, X Shares, Z Shares, Class 1 Shares, Class 2 Shares, Class 3 Shares, Class 4 Shares, Class 8 Shares, and Class 9 Shares representing various features and charging structures as described below. Some Share Classes are available only to certain sub-distributors and Eligible Investors, or only to existing Shareholders.

Shares are further divided and named according to their currency of denomination, hedging policy (if applicable), and distribution policy, as described below.

As at the date of this Prospectus, CNH denominated Share Classes are not available to retail investors in Hong Kong.

For the most current information on available share classes and distribution frequencies, go to columbiathreadneedle.com or request a list free of charge from the Management Company, or consult your local distributor.

## A. Initial Offering Price per Share

*See table below, the initial offering price for the Share Classes is shown below in each currency in which they may be made available, to the exclusion of any potential initial sales charge*[21].

| Shares: | EUR | USD | GBP | CHF | DKK | JPY | NOK | SEK | SGD | AUD | CNH | HKD |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| A Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| B Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| D Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| I Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| L Shares[22] | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| M Shares[23] | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| N Shares[24] | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| S Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| T Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| W Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| X Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |
| Z Shares | 10 | 10 | 10 | 10 | 10 | 100 | 10 | 100 | 10 | 10 | 100 | 100 |

The initial offering price for the Share Classes 1, 2, 3, 4, 8 and 9 will be determined by the Board of Directors for each of the Portfolios at its sole discretion.

## B. Minimum Initial Investment

The minimum initial investment amount for the Share Class within a Portfolio is shown in the table below. The minimum initial investment amount may be waived at the discretion of the board of directors of the Management Company, provided the principle of fair and equal treatment between Shareholders be respected. For Shares purchased through a sub-distributor, different minimum initial investment amounts may apply, as determined by the sub-distributors through which the Shares are subscribed.

[21] For the European Short-Term High Yield Bond Portfolio, the initial offering price of all Share Classes will be EUR 100; USD 100; GBP 100; CHF 100; DKK 100; NOK 100; SEK 1,000; SGD 100; AUD 100; CNH 1,000; HKD 1,000.

[22] For the Japan Equities Portfolio, the initial offering price of the L Shares will be EUR 1,000; USD 1,000; GBP 1,000; CHF 1,000; DKK 1,000; JPY 10,000; NOK 1,000; SEK 10,000; SGD 1,000; AUD 1,000; CNH 10,000; HKD 10,000.

[23] For the Japan Equities Portfolio, the initial offering price of the M Shares will be EUR 1,000; USD 1,000; GBP 1,000; CHF 1,000; DKK 1,000; JPY 10,000; NOK 1,000; SEK 10,000; SGD 1,000; AUD 1,000; CNH 10,000; HKD 10,000.

[24] For the European Social Bond Portfolio, the initial offering price of the N Shares will be EUR 1,000; USD 1,000; GBP 1,000; CHF 1,000; DKK 1,000; JPY 10,000; NOK 1,000; SEK 10,000; SGD 1,000; AUD 1,000; CNH 10,000; HKD 10,000.

| Class | EUR | USD | GBP | CHF | DKK | JPY | NOK | SEK | SGD | AUD | CNH | HKD |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| A Shares | 2,500 | 2,500 | 2,000 | 3,500 | 20,000 | 300,000 | 20,000 | 20,000 | 2,500 | 2,500 | 20,000 | 20,000 |
| B Shares | 2,500 | 2,500 | 2,000 | 3,500 | 20,000 | 300,000 | 20,000 | 20,000 | 2,500 | 2,500 | 20,000 | 20,000 |
| D Shares | 2,500 | 2,500 | 2,000 | 3,500 | 20,000 | 300,000 | 20,000 | 20,000 | 2,500 | 2,500 | 20,000 | 20,000 |
| I Shares[25] | 100,000 | 100,000 | 100,000 | 150,000 | 1,000,000 | 10,000,000 | 1,000,000 | 1,000,000 | 100,000 | 100,000 | 1,000,000 | 1,000,000 |
| L Shares | 1,000,000 | 1,000,000 | 1,000,000 | 1,500,000 | 10,000,000 | 100,000,000 | 10,000,000 | 10,000,000 | 1,000,000 | 1,000,000 | 10,000,000 | 10,000,000 |
| M Shares | 1,000,000 | 1,000,000 | 1,000,000 | 1,500,000 | 10,000,000 | 100,000,000 | 10,000,000 | 10,000,000 | 1,000,000 | 1,000,000 | 10,000,000 | 10,000,000 |
| N Shares[26] | 50,000,000 | 50,000,000 | 50,000,000 | 75,000,000 | 500,000,000 | 7,000,000,000 | 500,000,000 | 500,000,000 | 50,000,000 | 50,000,000 | 500,000,000 | 500,000,000 |
| S Shares | 2,500 | 2,500 | 2,000 | 3,500 | 20,000 | 300,000 | 20,000 | 20,000 | 2,500 | 2,500 | 20,000 | 20,000 |
| T Shares | 50,000,000 | 50,000,000 | 50,000,000 | 75,000,000 | 500,000,000 | 7,000,000,000 | 500,000,000 | 500,000,000 | 50,000,000 | 50,000,000 | 500,000,000 | 500,000,000 |
| W Shares | 10,000 | 10,000 | 10,000 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| X Shares | 5,000,000 | 5,000,000 | 3,000,000 | 7,500,000 | 30,000,000 | 700,000,000 | 30,000,000 | 30,000,000 | 5,000,000 | 5,000,000 | 30,000,000 | 30,000,000 |
| Z Shares | 1,500,000 | 2,000,000 | 1,000,000 | 1,500,000 | 10,000,000 | 200,000,000 | 10,000,000 | 10,000,000 | 2,000,000 | 2,000,000 | 10,000,000 | 10,000,000 |

No minimum initial investment is applicable to Share Classes 1, 2, 3, 4, 8 and 9.

[25] Except for the US Disciplined Core Equities Portfolio in which the minimum initial investment for I Shares shall be EUR 10,000,000 or its equivalent in the relevant currency.
[26] Except for the Global Technology Portfolio in which the minimum initial investment for N Shares shall be USD 100,000,000 or its equivalent in the relevant currency.

## C. Meaning of Characters in a Share Class Name

**Share Classes**

***a) First Character – Name of Share Class***

| Letter | Meaning |
|---|---|
| **"A"** | - intended for both retail and Institutional Investors<br>- different fee structure from the D Shares, T Shares and Z Shares<br>- minimum subscription amount identical to that of the corresponding D Shares but lower than that of the corresponding T Shares and Z Shares |
| **"B"** | - Only available for subsequent investments of existing Shareholders of the Portfolio "Global Technology" |
| **"D"** | - intended for both retail and Institutional Investors<br>- different fee structure from the A Shares, T Shares and Z Shares<br>- minimum subscription amount identical to that of the corresponding A Shares but lower than that of the corresponding T Shares and Z Shares |
| **"I"** | - Institutional Share Class<br>- lower minimum initial subscription amount than X Shares and N Shares |
| **"L"** | - Institutional Share Class<br>- Shares will only be available, at the discretion of the Management Company, for a fixed period of time or until the total Net Asset Value of the Portfolio reaches an amount as determined by the Management Company<br>- Once the available time period expires or the total Net Asset Value of a Portfolio reaches an amount as determined by the Management Company, the L Shares in that Portfolio will be closed to subscriptions from new Shareholders<br>- The Management Company reserves the right to limit the total amount of L Shares allocated to a single investor |
| **"M"** | - intended for both retail and Institutional Investors<br>- available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients<br>- Shares will only be available, at the discretion of the Management Company, for a fixed period of time or until the total Net Asset Value of the Portfolio reaches an amount as determined by the Management Company<br>- Once the available time period expires or the total Net Asset Value of a Portfolio reaches an amount as determined by the Management Company, the M Shares in that Portfolio will be closed to subscriptions from new Shareholders<br>- The Management Company reserves the right to limit the total amount of M Shares allocated to a single investor |
| **"N"** | - Institutional Share Class<br>- exclusively available, at the discretion of the Management Company, to Shareholders subscribing through certain select sub-distributors<br>- minimum subscription higher than that of the corresponding I Shares and X Shares |
| **"S"** | - exclusively available to Shareholders subscribing through certain select sub-distributors |
| **"T"** | - intended for both retail and Institutional Investors<br>- different fee structure from the A Shares, D Shares and Z Shares |

| | |
|---|---|
| | - minimum subscription amount higher than that of the corresponding A Shares, D Shares and Z Shares<br>- exclusively available, at the discretion of the Management Company, to certain select sub-distributors that have entered into separate fee arrangements with their clients |
| **"W"** | - intended for distribution to existing Shareholders only |
| **"X"** | - Institutional Share Class<br>- higher minimum initial subscription amount than I Shares |
| **"Z"** | - intended for both retail and Institutional Investors<br>- different fee structure from the A Shares, D Shares and T Shares<br>- minimum subscription amount higher than that of the corresponding A Shares and D Shares<br>- available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients. If operating within the European Union (ex UK) the distributors will ordinarily be distributors providing (i) discretionary portfolio management; (ii) investment advice on an independent basis or (iii) investment advice on a non-independent basis where those distributors have agreed with their clients to receive fee-based remuneration and will not receive commission and or trail fees, each as defined in the Markets in Financial Instruments Directive. For distributors operating under (i), (ii) or (iii) above no minimum subscription/investment level applies<br>Existing Shareholders in Z Shares, who held such Shares as at 1 January 2018 but no longer comply with the requirements set out above, can continue to hold such Shares and will be able to continue to apply for additional subscriptions in Z Shares |
| **"1"** | - Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who switched into this Share Class from another Share Class 1 to 9 of the same Portfolio or (iii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company |
| **"2"** | - Institutional Share Class<br>- Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who switched into this Share Class from another Share Class 1 to 9 of the same Portfolio or (iii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company<br>- Available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients. If operating within the European Union (ex UK) the distributors will ordinarily be distributors providing (i) discretionary portfolio management; (ii) investment advice on an independent basis or (iii) investment advice on a non-independent basis where those distributors have agreed with their clients to receive fee-based remuneration and will not receive commission and or trail fees, each as defined in the Markets in Financial Instruments Directive. |
| **"3"** | - Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who switched into this Share Class from another Share Class 1 to 9 of the |

| | |
|---|---|
| | same Portfolio or (iii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company<br>- Available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients. If operating within the European Union (ex UK) the distributors will ordinarily be distributors providing (i) discretionary portfolio management; (ii) investment advice on an independent basis or (iii) investment advice on a non-independent basis where those distributors have agreed with their clients to receive fee-based remuneration and will not receive commission and or trail fees, each as defined in the Markets in Financial Instruments Directive. |
| **"4"** | - Institutional Share Class<br>- Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who switched into this Share Class from another Share Class 1 to 9 of the same Portfolio or (iii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company |
| **"8"** | - Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company<br>- Available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients. If operating within the European Union (ex UK) the distributors will ordinarily be distributors providing (i) discretionary portfolio management; (ii) investment advice on an independent basis or (iii) investment advice on a non-independent basis where those distributors have agreed with their clients to receive fee-based remuneration and will not receive commission and or trail fees, each as defined in the Markets in Financial Instruments Directive. |
| **"9"** | - Institutional Share Class<br>- Only available for distribution to existing Shareholders who (i) received this Share Class following a vote to merge or transfer their investment into one of the Portfolios of the SICAV or (ii) who switched into this Share Class from another Share Class 1 to 9 of the same Portfolio or (iii) who subscribed to this Share Class prior to the effective date of the merger or transfer referenced under (i), at the discretion of the Management Company, and to existing clients at the discretion of the Management Company<br>- Available, at the discretion of the Management Company, to eligible distributors that have entered into separate fee arrangements with their clients. If operating within the European Union (ex UK) the distributors will ordinarily be distributors providing (i) discretionary portfolio management; (ii) investment advice on an independent basis or (iii) investment advice on a non-independent basis where those distributors have agreed with their clients to receive fee-based remuneration and will not receive commission and or trail fees, each as defined in the Markets in Financial Instruments Directive. |

***b) Second Character (if relevant) – Currency of Share Class***

| **Letter** | **Meaning** |
|---|---|
| "**D**" | - denominated in DKK |
| "**E**" | - denominated in EUR |
| "**F**" | - denominated in CHF |
| "**G**" | - denominated in GBP |
| "**J**" | - denominated in JPY |
| "**K**" | - denominated in SEK |
| "**N**" | - denominated in NOK |
| "**Q**" | - denominated in HKD |
| "**R**" | - denominated in CNH |
| "**S**" | - denominated in SGD |
| "**U**" | - denominated in USD |
| "**V**" | - denominated in AUD |

***c) Third Character (if relevant) – Other Feature of the Share Class***

| **Letter** | **Meaning** |
|---|---|
| "**C**" | - dividend paying Share Class<br>- hedging between the currency of the Share Class and the Base Currency of the Portfolio *Share Class hedging is done with the objective of minimising currency risk exposure, however it may increase or decrease the return to investors holding Shares of hedged Share Classes* |
| "**H**" | - hedging between the currency of the Share Class and the Base Currency of the Portfolio *Share Class hedging is done with the objective of minimising currency risk exposure, however it may increase or decrease the return to investors holding Shares of hedged Share Classes* |
| "**P**" | - dividend paying Share Class |
| "**M**" | - monthly dividend paying share class |
| "**T**" | - monthly dividend paying share class<br>- hedging between the currency of the Share Class and the Base Currency of the Portfolio<br>- *Share Class hedging is done with the objective of minimising currency risk exposure, however it may increase or decrease the return to investors holding Shares of hedged Share Classes.* |

The third character appears on Share Classes that pay dividends ("Distributing Share Classes"), are currency hedged, or both. Shares that do not pay dividends ("Accumulation Share Classes") and are not hedged have no third

character. For more information about Distributing and Accumulation Share Classes, see the "Dividend Policy" section of this Prospectus.

**D. Fees**

A summary of the fees associated with an investment in each Share Class for each Portfolio, including any applicable Asset Management Fee or front-end sales charges, is found in the section entitled "Fees and Expenses" and in Appendices C to T of this Prospectus.

## PURCHASE OF SHARES

Investors will be required to complete an initial subscription application or other documentation satisfactory to the Management Company, sub-distributor and/or the Registrar and Transfer Agent in order to purchase Shares.

Applications for the subscription of Shares in relation to a Valuation Date should be received by the Registrar and Transfer Agent prior to 3.00 p.m. (Luxembourg time) on the relevant Valuation Date Any applications received by the Registrar and Transfer Agent after this time will be dealt with on the next Valuation Date. At the discretion of the Directors, applications transmitted prior to the cut-off but received by the Registrar and Transfer Agent only after the cut-off may be treated as if they had been received prior to the cut-off.

Different subscription procedures and earlier time limits may apply if applications for Shares are made through a sub-distributor. In particular a sub-distributor or dealing platform may have in place a dealing cycle which means a trade received by the sub-distributor before 3.00pm (Luxembourg) time will not be dealt with on the next Valuation Date. In such instance, the sub-distributors will inform the applicant of the relevant procedure together with any time limit by which the application must be received. No sub-distributor is permitted to withhold subscription orders to benefit itself or its customers by a price change.

In the event the SICAV has suspended the Net Asset Value determination, the valuation on the first Valuation Date (on which the SICAV resumes the Net Asset Value determination) occurring after receipt of the order will be utilised.

Any order may be rejected by the Management Company, the sub-distributor, the Registrar and Transfer Agent or the SICAV. The SICAV reserves the right to suspend the sale to the public of Shares of any Portfolio in response to conditions in the securities markets or otherwise.

During the continuous offerings of the Shares of the respective Portfolios, the Subscription Price of Classes of Shares of each Portfolio is the Net Asset Value per Share of such Class plus any applicable sales charges imposed at the time of purchase. Sales charges can be found in Appendices C, E, H, J, K, L, N, O and Q. No initial sales charge is payable in respect of B Shares, I Shares, L Shares, N Shares X Shares, Class 2 Shares, Class 4 Shares, Class 8 Shares or Class 9 Shares.

**Subject to the terms of this Prospectus, Shares are available for purchase on each Valuation Date, which is normally each Business Day.**

Prior to subscription to X Shares and Class 4 Shares, the prospective Shareholder must have received confirmation that they fall within the definition of Eligible Investors.

In each Class, Shares may be made available in the currency in which the Class is denominated and in such other freely convertible currencies upon a decision of the Directors.

The SICAV retains the right to offer only one Class of Shares of each Portfolio for purchase by investors in any particular jurisdiction in order to conform to local law, or any other reason. The SICAV also reserves the right to adopt standards applicable to classes of investors or transactions that permit or require the purchase of a particular Class of Shares of a Portfolio. Investors should consult their distributor or sub-distributor representatives for information concerning the Classes of Shares of each Portfolio currently available for purchase or write to the SICAV's Registrar and Transfer Agent.

If in any country in which a Class of Shares of a Portfolio is offered with an initial sales charge, local law or practice requires or permits a lower initial sales charge than set forth in Appendices C, E, H, J, K, L, N, O and Q for any

individual purchase order, the Management Company may sell Shares, and may authorise sub-distributors to sell Shares, within such country with a lower sales charge. The SICAV also retains the right to authorise the Management Company or sub-distributor to sell Shares of each affected Class of a Portfolio with a higher initial sales charge, but not in excess of 5.0% of the Net Asset Value per Share.

The applicable Subscription Price of each Class of Shares ordinarily will be payable within three Business Days after the relevant Valuation Date. If the payment period in the relevant currency ends on a day which is not a bank business day in New York and Luxembourg in respect of U.S. Dollar, Luxembourg and Brussels in respect of the Euro, Luxembourg and London in respect of GBP, Luxembourg and Geneva in respect of CHF, Luxembourg and Copenhagen in respect of DKK, Luxembourg and Tokyo in respect of JPY, Luxembourg and Oslo in the case of NOK, Luxembourg and Stockholm in respect of SEK, Luxembourg and Singapore in respect of SGD, Luxembourg and Sydney in respect of AUD, Luxembourg and Hong Kong in the case of HKD and CNH, then payment must be made on the next following bank business day in the relevant place. The Subscription Price of each Class of Shares of each Portfolio shall be available in Luxembourg at the registered office of the SICAV unless alternative arrangements are made by the Management Company or sub-distributors.

The SICAV may elect, at its discretion, to accept in certain cases subscriptions in kind by contribution of Transferable portfolio Securities and other eligible assets and any associated transfer costs may be charged to the Shareholder, provided that these are suitable assets in respect of the relevant Portfolio's investment objective and that their market value on the relevant Valuation Date will be verified by a special report of Luxembourg independent auditors at the expense of the contributing Shareholder(s).

Share confirmations will be sent to investors within one month after Shares are issued, by the Registrar and Transfer Agent, to the investor's address or elsewhere at his request and expense, unless alternative arrangements are made by the Management Company or sub-distributor.

## REDEMPTION OF SHARES

The Articles provide that it will, subject to the limitations described therein, redeem Shares of any Class of a Portfolio tendered to it by Shareholders. Subject to the terms of this document, Shares may be redeemed on each Valuation Date. Requests for redemption must be made in writing to the Registrar and Transfer Agent at its registered office and are irrevocable, except during any period of suspension or deferral of redemption as described below.

In case of suspension or deferral of the Net Asset Value determination or postponement of redemption requests, Shares of such Portfolio presented for redemption as from the date of such suspension or postponement will be redeemed upon the SICAV resuming redemption at the first then determined Net Asset Value.

Redemption requests in relation to a Valuation Date should be received by the Registrar and Transfer Agent prior to 3.00 p.m. (Luxembourg time) on the relevant Valuation Date in order to receive the prevailing Net Asset Value for that Valuation Date. Any request received by the Registrar and Transfer Agent after that time will be treated as received on the next succeeding Valuation Date. At the discretion of the Directors, requests transmitted prior to the cut-off but received by the Registrar and Transfer Agent only after the cut-off may be treated as if they had been received prior to the cut-off.

Payments will ordinarily be made within three Business Days after the relevant Valuation Date in U.S. Dollar, Euro, GBP, CHF, DKK, JPY, NOK, SEK, SGD, HKD, CNH or AUD (depending on which currency was elected at the time of subscription). If the date for payment is not a bank business day in the country of the relevant payment currency (*e.g.*, New York for U.S. Dollar, Brussels for Euro, London for GBP, Geneva for CHF, Stockholm for SEK, Copenhagen for DKK, Tokyo for JPY. Oslo for NOK, Singapore for SGD, Sydney for AUD, Hong Kong for HKD and CNH) and in Luxembourg, the payment will be made on the next day that is a bank business day in such countries. Upon the request of an investor, payment of redemption proceeds may also be made to the relevant sub-distributor who will remit the relevant funds, if so requested by the investor, in local currency as may be freely purchased with U.S. Dollar, GBP, CHF, DKK, JPY, NOK, Euro, SEK, SGD, AUD, HKD or CNH as the case may be (depending on which currency was elected at the time of subscription). Payment will not be processed until the Subscription Price on the purchase of Shares has been paid.

The value of Shares of each Portfolio at the time of redemption may be more or less than the Subscription Price, depending on the market value of the relevant Portfolio's investments at such time.

The SICAV's obligation to redeem Shares of each Portfolio is subject to suspension or deferral as set forth below and under the section “Suspension of Issue, Redemption and Exchange of Shares and Calculation of Net Asset Value”.

The SICAV shall not be bound to redeem or exchange Shares on any Valuation Date where the aggregate redemption or exchange requests total more than 10% of a Portfolio's Shares or Class of Shares outstanding on such Valuation Date. Accordingly, any aggregate redemption or exchange request in excess of such limits may be deferred in total for a period that the Directors consider to be in the best interest of the SICAV but normally not exceeding 30 Valuation Dates after the date of receipt of the redemption or exchange requests. This mechanism constitutes a redemption gate. In case of deferral of redemptions or conversions, the relevant Shares will be redeemed or exchanged at the Net Asset Value per Share as of the Valuation Date following such period.

The SICAV may, in certain cases, subject to the fair and equal treatment of the remaining Shareholders of any Class of Shares and by agreement with redeeming Shareholders, effect payment for redeemed Shares of Portfolios by an in kind transfer, of securities and other assets of the relevant Portfolio. In kind transfers shall only be activated to meet redemptions requested by professional investors and will correspond to a pro rata share of the assets held by the relevant Portfolio. The nature and type of assets to be transferred in such case shall be determined on a fair and reasonable basis and without prejudicing the interests of the other Shareholders of the relevant class or classes of Shares. In the event that a redemption of Shares is effected by way of an in kind transfer any associated transfer costs may be charged to the redeeming Shareholder, provided that the market value of such securities will be verified by a special report of Luxembourg independent auditors, at the expense of the redeeming Shareholder(s).

If the value of the account held by any Shareholder in any Class of Shares of a Portfolio would fall below the equivalent of US$ 1,000 or 100 Shares, the Management Company may decide to redeem (or exchange) the entire shareholding of such Shareholder.

## RESTRICTIONS ON SUBSCRIPTIONS AND CONVERSIONS INTO CERTAIN PORTFOLIOS

A Portfolio may be closed to new subscriptions or conversions in (but not to redemptions or conversions out) if, in the opinion of the Management Company, this is necessary to protect the interests of existing Shareholders. One such circumstance would be where the Portfolio has reached a size such that the capacity of the market and/or the capacity of the Management Company or the relevant Investment Manager has been reached, and where to permit further inflows would be detrimental to the performance of the Portfolio. Any Portfolio which, in the opinion of the Management Company, is materially capacity constrained may be closed to new subscriptions or conversions without notice to Shareholders. Once closed to new subscriptions or conversions in, a Portfolio will not be re-opened until, in the opinion of the Management Company, the circumstances which required closure no longer prevail and significant capacity is available within the Portfolio for new investment.

Where closures to new subscriptions or conversions occur, the website www.columbiathreadneedle.com/lux will be amended to indicate the change in status of the applicable Portfolio or Share Class. Investors should confirm with the Management Company for the current status of Portfolios or Share Classes.

## MERGER OR LIQUIDATION

### A. The Portfolios/Classes of Shares

The Directors may decide to liquidate a Portfolio created for an unlimited period of time or a Class of Shares if the net assets of such Portfolio or Class of Shares fall below an amount determined by the Directors to be a minimum level to enable such Portfolio or Class to be operated in an economically efficient manner, if a change in the economic or political situation relating to the Portfolio or Class concerned would justify such liquidation or, if for other reasons the Directors believe it is required for the interests of the Shareholders. If a Portfolio is feeder of another UCITS or of one of its sub-funds, the merger, split or liquidation of such master UCITS or such relevant master sub-fund of the UCITS triggers liquidation of the feeder Portfolio, unless the investment policy of such Portfolio is amended in compliance with Part I of the 2010 Law. The decision of the liquidation will be published (either in a newspaper in Luxembourg and in newspapers issued in countries where the Shares are sold (insofar as required by applicable regulations), or sent to the Shareholders at their addresses indicated in the register of Shareholders or communicated via other means as deemed appropriate by the Directors) prior to the effective date of the liquidation and the publication will indicate the reasons for, and the procedures of, the liquidation. Unless the Directors otherwise decide in the interests of or to keep equal treatment

between the Shareholders, the Shareholders of the Portfolio or Class of Shares concerned may continue to request to redeem or to exchange their Shares without redemption fees. Assets which cannot be distributed to their beneficiaries upon the completion of the liquidation of the Portfolio or Class of Shares concerned will be deposited with the Depositary for a period of six months after the completion of the liquidation. After such time, the assets will be deposited with the *Caisse de Consignation* on behalf of their beneficiaries. The liquidation of a Portfolio shall in principle be closed within nine months from the decision to liquidate. In the event where such liquidation could not be closed within such timeframe, an authorisation to extend the period must be sought from the CSSF. Any funds to which Shareholders are entitled upon the liquidation of the Portfolio and which are not claimed by those entitled thereto prior to the close of the liquidation process shall be deposited for the persons entitled thereto at the *Caisse de Consignation* in Luxembourg and shall be forfeited after thirty years.

Under the same circumstances as provided in the preceding paragraph, the Directors may decide to liquidate one Portfolio by contribution into another Portfolio. Such decision will be published in the same manner as described in the preceding paragraph and, in addition, the publication will contain information in relation to the new Portfolio. Such publication will be made one month (or such longer period as required by compulsory law) before the date on which the amalgamation becomes effective in order to enable Shareholders to request redemption of their Shares, without redemption fees, before the operation involving contribution into another Portfolio becomes effective.

The Directors may also, under the same circumstances as provided above, decide to liquidate one Portfolio by contribution into another Luxembourg UCITS governed by the 2010 Law or to another UCITS in another EU member state. Such decision will be published in the same manner as described above and, in addition, the publication will contain information in relation to the other UCITS. Such publication will be made one month (or such longer period as required by compulsory law) before the date on which the merger becomes effective in order to enable Shareholders to request redemption of their Shares, free of charge, before the operation involving contribution into another UCITS becomes effective.

In the event that the Directors believe it is required for the interests of the Shareholders of the relevant Portfolio or that a change in the economic or political situation relating to the Portfolio concerned has occurred which would justify it, the reorganisation of one Portfolio, by means of a division into two or more Portfolios, may be decided by the Directors. Such decision will be published in the same manner as described above and, in addition, the publication will contain information in relation to the two or more new Portfolios. Such publication will be made one month (or such longer period as required by compulsory law) before the date on which the reorganisation becomes effective in order to enable the Shareholders to request redemption of their Shares, free of charge before the operation involving division into two or more Portfolios becomes effective.

Any of the aforesaid decisions of liquidation, amalgamation, merger or reorganisation may for any reason also be decided by a separate meeting of the Shareholders of relevant Classes in the Portfolio concerned where no quorum is required and the decision is taken at the simple majority of the Shares voting at the meeting.

Should future Portfolios be created for a limited maturity, the procedure for liquidation, amalgamation, merger or reorganisation will be described in the sales documents of the SICAV.

The Board may also decide to merge an existing Portfolio or a Share Class of an existing Portfolio (i.e. the absorbing entity of the merger) with another Portfolio or a share class in another Portfolio or with another UCITS governed by the laws of the Grand Duchy of Luxembourg or another UCITS in another Member State (i.e. the absorbed entity of the merger). Such decision will be communicated to the Shareholders in accordance with the 2010 Law. Such publication will be made within one month at least before the date on which the merger becomes effective in order to enable Shareholders to request redemption of their Shares, free of charge.

**B. The SICAV**

The SICAV may at any time be dissolved by a resolution of the general meeting of Shareholders. Liquidation will be carried out by one or more liquidators appointed by the general meeting of Shareholders and the net liquidation proceeds of the SICAV distributed to Shareholders in proportion to their respective holdings at the close of liquidation.

Assets or proceeds which cannot be distributed following liquidation of the SICAV will be deposited with the *Caisse de Consignation*.

Whenever the Share capital of the SICAV falls below two thirds of the minimum capital required by Luxembourg law, the question of the dissolution of the SICAV shall be referred to the general meeting by the Directors. The general meeting, for which no quorum shall be required, shall decide by simple majority of the Shares present and represented at the meeting. The question of the dissolution of the SICAV shall further be referred to the general meeting whenever the Share capital falls below one fourth of the minimum capital indicated above. In such an event, the general meeting shall be held without any quorum requirements and the dissolution may be decided by Shareholders holding one fourth of the Shares present and represented at the meeting. This general meeting must be convened within 40 days from the date of ascertaining that the net assets of the SICAV have fallen below the relevant minimum.

## EXCHANGE PRIVILEGE

Each Shareholder will be entitled to exchange its Shares for: (i) Shares of the same Class of another Portfolio or (ii) Shares of a different Class of the same or of another Portfolio provided that (i) the Shareholder satisfies all relevant eligibility and minimum initial investment requirements of the new Class and, if relevant, Portfolio; and (ii) the requested Class is available in the jurisdiction in which the Shareholder is subscribing.

Exchanges consist of a redemption of the existing Shares of a Class immediately followed by a subscription of new Shares in another Class.

Shareholders that are exchanging their Shares shall note that:

- they may be subject to a Dilution Adjustment;
- where an exchange involves a change of denomination or payment currency, the currency conversion costs will be borne by the Shareholder;
- if there is a difference in the initial sales charge imposed between the two relevant Classes between which the exchange will be effected, the difference may be assessed to the Shares involved in the exchange; and
- the Management Company and sub-distributors of the SICAV may impose an exchange fee of up to 0.75% of the Net Asset Value of the Shares on each exchange of those Shares acquired through them. The exchange fee, if any, will be deducted at the time of such exchange and paid to the relevant distributors.

To exercise the right to exchange Shares in relation to a Valuation Date, the Shareholder must deliver an exchange order in proper form to the Registrar and Transfer Agent. Exchange orders should be received by the Registrar and Transfer Agent prior to 3.00 p.m. (Luxembourg time) on the relevant Valuation Date. Any exchange orders received by the Registrar and Transfer Agent after this time will be dealt with on the next Valuation Date. At the discretion of the Directors, exchange orders transmitted prior to the cut-off but received by the Registrar and Transfer Agent only after the cut-off may be treated as if they had been received prior to the cut-off.

Exchanges shall be effected on the basis of the Net Asset Value per Share for the relevant Classes on the same Valuation Date.

The exchange of Shares is not available in certain countries and prospective investors should inform themselves as to whether the exchange of Shares is available in their country. Shareholders should also be aware that the exchange of Shares may constitute a taxable event and should inform themselves of any potential consequence of this.

## MARKET TIMING & LATE TRADING

The SICAV may reject or cancel any purchase orders, including exchanges, for any reason.

For example, excessive trading of Shares in response to short-term fluctuations in the market, a trading technique sometimes referred to as ‘market timing’, has a disruptive effect on portfolio management and increases Portfolio expenses. Accordingly, the SICAV may in the sole discretion of the Directors compulsorily redeem or reject any purchase orders, including exchanges, from any investor that the SICAV reasonably believes has engaged in market timing activity, or investors that in the Directors’ sole discretion, may be disruptive to the SICAV or any Portfolio. For these purposes, the Directors may consider an investor's trading history in the Portfolios and accounts under common control or ownership.

Moreover, in addition to the exchange fees listed elsewhere in this Prospectus, the SICAV may impose a penalty of 2.00% of the Net Asset Value of the Shares redeemed or exchanged where the SICAV reasonably believes that an

investor has engaged in market timing activity. The Shareholders concerned will be warned in advance if such a fee is likely to be charged and that penalty shall be credited to the relevant Portfolio. The Directors will not be held liable for any loss resulting from rejected orders or mandatory redemption.

Late trading is not allowed by the SICAV.

## SUSPENSION OF ISSUE, REDEMPTION AND EXCHANGE OF SHARES AND CALCULATION OF NET ASSET VALUE

All subscriptions, redemptions or exchanges will be done on the Net Asset Value next calculated after the order is received (*e.g.* an unknown Net Asset Value).

The SICAV, where considered to be in the best interest of the Shareholders, may suspend the determination of the Net Asset Value, the issue of Shares and the right of any Shareholder to require redemption or exchange of Shares of any Portfolio:

(a) During any period when any principal stock exchange, Regulated Market or any Other Regulated Market in a Member State or in an Other State on which a substantial part of the SICAV's investments attributable to such Portfolio is quoted, or when one or more foreign exchange markets in the currency in which a substantial portion of the assets of the Portfolio is denominated, are closed otherwise than for ordinary holidays or during which dealings are substantially restricted or suspended; or

(b) Political, economic, military, monetary or other emergency beyond the control, liability and influence of the SICAV makes the disposal of the assets of any Portfolio impossible under normal conditions or such disposal would be detrimental to the interests of the Shareholders; or

(c) During any breakdown in the means of communication network normally employed in determining the price of any of the relevant Portfolio's investments or the current prices on any market or stock exchange or any other reason makes it impossible to determine the value of a major portion of the assets of any Portfolio; or

(d) During any period when the remittance or transfer of monies which will or may be involved in the realisation of, or in the payment of the relevant Portfolio's investments or in the redemption of Shares is not possible or cannot, in the opinion of the Directors be carried out at normal rates of exchange, or where it can be objectively demonstrated that purchases and sales of the assets of any Portfolio cannot be effected at normal prices and/or without materially prejudicing the interests of the Shareholders; or

(e) In case of a decision to liquidate the SICAV or a Portfolio on and after the day of publication of the first notice convening the general meeting of Shareholders for this purpose or notice given by the Board to this effect, as applicable; or

(f) When the NAV calculation of a UCI or Portfolio in which a Portfolio has invested more than 50% of its NAV is suspended.

The SICAV shall suspend the issue, exchange and redemption of Shares of any Class within a Portfolio forthwith upon occurrence of an event causing it to enter into liquidation or upon the order of the Regulatory Authority.

In addition, the issue, exchange and redemption of Shares shall be forbidden:

(a) for the whole period during which the SICAV does not have a depositary;

(b) in cases where the SICAV declares bankruptcy, applies for a scheme of composition with creditors (*bénéfice de concordat*), suspension of payments (*sursis de paiement*) or controlled management (*gestion contrôlée*), or upon occurrence of any such event affecting the Depositary.

Any suspension shall be published, if appropriate, by the SICAV and Shareholders requesting subscription, exchange or redemption of their Shares shall be notified by the SICAV of the suspension at the time of the filing of the written request for such subscription, exchange and redemption. The suspension as to any Portfolio will have no effect

on the determination of Net Asset Value and the issue, redemption or exchange of Shares in any Class of the other Portfolios.

## DIVIDEND POLICY

The policy of the SICAV in respect of Accumulation Share Classes is to make no distributions and to retain all net earnings within the Net Asset Value of the same Portfolio and Share Class. In respect of Distributing Share Classes the SICAV intends to make distributions, with a frequency, at least annually, and in an amount to be determined by the Directors, provided that the Directors may at any time delegate such determination to the Management Company, acting through its Dividend Committee. The Shareholders of Distributing Share Classes have the option to receive the dividend or to reinvest it in the same Share Class without any subscription charge.

The general policy for Distributing Share Classes is to distribute dividends based on all investment income received for the distribution period before the deduction of fees and expenses, i.e. gross of fees and expenses. The Directors (or where applicable the Management Company acting through its Dividend Committee pursuant to a delegation), should they deem it appropriate, reserve the right to distribute a different amount and may determine if and to what extent dividends may include distributions from capital.

No distribution may be made which would result in the Net Asset Value of the SICAV falling below the minimum capital required by Luxembourg law.

Distributions reduce the Net Asset Value per Share by the amount distributed. Shareholders should note that distributions made gross of fees and expenses may result in higher dividend payments; however since fees and expenses are charged to capital rather than income, the potential for future capital appreciation of the Net Asset Value may be reduced.

Certain Portfolios may also use derivatives, such as call options, with the aim of generating additional income. Shareholders should note that whilst this may allow more income to be distributed, it may also have effect of reducing capital and the potential for future capital appreciation.

The taxation of distributions varies in different jurisdictions and in particular dividends paid out of capital may have different tax implications to dividends paid out of income. Shareholders are recommended to seek their own professional tax advice in this regard.

## TAX CONSIDERATIONS

*General*

This section is based on the Directors' understanding of the law and practice currently in force in Luxembourg and is subject to changes therein. It should not be taken as constituting legal or tax advice and investors are advised to obtain information and, if necessary, advice regarding the laws and regulations applicable to them by reason of the subscription, purchase, holding and realisation of Shares in their countries of origin, residence or domicile.

*A. The SICAV*

Under current law and practice, the SICAV is not liable to any Luxembourg income tax. Dividends, interest and capital gains received by the SICAV on portfolio investments may be subject to non-recoverable withholding taxes in the countries of origin.

The SICAV is subject to a subscription tax ("*taxe d'abonnement*") of 0.05% per annum levied on the Net Asset Value at the last day of each calendar quarter in accordance with the 2010 Law. A reduced tax rate of 0.01% per annum of the net assets will be applicable to Share Classes which are only sold to and held by Institutional Investors. In addition, those Portfolios which invest exclusively in deposits and Money Market Instruments in accordance with the Luxembourg Law are liable to the same reduced tax rate of 0.01% per annum of their net assets.

The 0.01% and 0.05% rates described above, as appropriate, are not applicable for the portion of the assets of the SICAV invested in other Luxembourg collective investment undertakings which are themselves subject to the asset based taxes.

For the avoidance of doubt, this *taxe d'abonnement* forms part of the Operating Expenses.

No tax is payable in Luxembourg on realised or unrealised capital appreciation of the assets of the SICAV. Although the SICAV's realised capital gains, whether short-or-long-term, are not expected to become taxable in another country, the Shareholders must be aware and recognise that such a possibility is not totally excluded.

The tax laws and regulations in the investee countries may be subject to change. The application and enforcement of foreign withholding tax laws and regulations could have a significant adverse effect on the SICAV and its Shareholders, particularly in relation to US withholding tax if imposed upon foreign investors. The SICAV reserves the right to provide for foreign withholding tax on sub-funds investing in those jurisdictions which imposed foreign withholding tax. As any provision made by the SICAV will be based on current market expectations and the SICAV's understanding of the tax laws and regulations, any changes to market practice or interpretation of tax rules may impact this provision and may result in this provision being higher or lower than required. The SICAV does not currently intend to make any accounting provisions for these tax uncertainties. It is possible that new tax laws and regulations and any new interpretations may be applied retrospectively.

*B. Shareholders*

Under current legislation, non-resident Shareholders are not subject to any capital gains or income tax in Luxembourg except for those who maintain a permanent establishment in Luxembourg to which the share capital of the SICAV is allocated. Corporate Shareholders resident in Luxembourg, or having a permanent establishment in Luxembourg to which the Shares are allocated, are subject to tax in Luxembourg on the amount of the distribution made by the SICAV and on capital gains realised at the ordinary applicable corporate income tax rate.

Individual Shareholders domiciled or resident in Luxembourg are subject to personal tax in Luxembourg on the amount of the distribution made by the SICAV at a progressive rate. They are only subject to tax on capital gains realised on disposal of their Shares if (i) they personally or by attribution hold, or have held at any time during the last 5 years, 10% or more of the issued share capital of the SICAV or (ii) dispose of all or part of their holdings within six months from the date of acquisition or before their acquisition.

C. *Foreign Account Tax Compliance Act*

Luxembourg has entered into a Model 1 Intergovernmental Agreement with the United States. The terms of the Intergovernmental Agreement ("**IGA**") state that the SICAV as a financial institution will be obliged to comply with the provisions of FATCA under the terms of the Luxembourg legislation implementing the IGA, rather than under the US Treasury Regulations implementing FATCA.

Under the Luxembourg IGA, the SICAV will be required to report to the Luxembourg tax authorities certain holdings by and payments made to a) certain US investors b) certain US controlled foreign entity investors and c) non-US financial institution investors that do not comply with the terms of the Luxembourg IGA legislation. Under the Luxembourg IGA, such information will be onward reported by the Luxembourg tax authorities to the US Internal Revenue Service under the general information exchange provisions of the US-Luxembourg tax treaty.

The scope and application of FATCA withholding and information reporting pursuant to the terms of FATCA and the IGAs is subject to review by the US, Luxembourg and other IGA governments, and rules may change. Investors should contact their own tax advisers regarding the application of FATCA to their particular circumstances.

The SICAV intends, within its rules as included within this prospectus, to be fully compliant with the terms of the Luxembourg IGA.

*D. Common Reporting Standard*

With a mandate by the G8/G20 countries the OECD developed the common reporting standard ("**CRS**") to achieve a comprehensive and multilateral automatic exchange of information ("**AEOI**") on a global basis. The CRS requires the SICAV as a Luxembourg financial institution to identify financial assets holders and establish if they are fiscally resident in countries with which Luxembourg has a tax information sharing agreement. Luxembourg financial institutions will then report financial account information of the assets holder to the Luxembourg tax authorities, which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis. Shareholders may therefore be reported to the Luxembourg and other relevant tax authorities under the applicable rules.

Under the Luxembourg law of 18 December 2015 implementing the EU Directive on AEOI, the exchange of information is due by 30 September each year. Accordingly, the SICAV is committed as of 1 January 2016 to run additional due diligence process on its Shareholders and to report the identity and residence of shareholders (including certain entities and their controlling persons) as well as relevant financial account information, to the Luxembourg tax authorities which will transmit that information to the country of residence of the foreign investors to the extent that they are resident of another EU Member State or of a country for which the Multilateral Agreement is in full force and applicable.

Shareholders should consult their professional advisors on the possible tax and other consequences with respect to the implementation of the CRS.

## RESTRICTIONS ON OWNERSHIP

The Articles permit to restrict or prevent the ownership of Shares of each Portfolio by any person, firm or corporate body including, but without limitation, any United States Person.

If it shall come to the attention of the SICAV at any time that Shares of any Portfolio are beneficially owned by a United States Person either alone or in conjunction with any other person, the SICAV may compulsorily redeem such Shares as the Directors believe necessary or appropriate to ensure compliance with United States law. Any such redemption shall have, as the Directors may determine, such retroactive effect as may be required for purposes of compliance with the 1940 Act.

The Institutional Share Classes are available only to Institutional Investors.

S Shares are exclusively available to Shareholders subscribing through certain select sub-distributors.

## MEETINGS AND REPORTS

The annual general meeting of Shareholders of the SICAV is held in the Grand Duchy of Luxembourg within six months of the SICAV's accounting year end. Other general meetings of Shareholders may be held at such time and place in Luxembourg as are indicated in the notices of such meetings. Notices of general meetings are given in accordance with Luxembourg law and in accordance with applicable rules in the relevant countries where Shares are publicly offered for sale. Notices will specify the place and time of the meeting, the conditions of admission, the agenda, the quorum and voting requirements.

An annual report containing the audited financial accounts of the SICAV, describing those of each Portfolio, will be made available to Shareholders in respect of the preceding fiscal year ended 31 March, at least 15 days before the annual general meeting. Unaudited semi-annual reports will also be made available to Shareholders at the registered office of the SICAV in respect of the period ending on 30 September in each year within two months thereafter. The consolidated accounts of the SICAV shall be expressed in U.S. Dollar.

The Shareholders of a specified Portfolio may, at any time, hold general meetings with the aim to deliberate on a subject that concerns only the Portfolio.

The Shareholders of any Class of Shares, issued in respect of any Portfolio may hold, at any time, general meetings to decide on any matters, which relate exclusively to such Class of Shares.

Unless otherwise stipulated by law or in the Articles, the decision of the general meeting of a specified Portfolio or Class of Shares will be reached by a simple majority of Shareholders present or represented.

## SERVICE PROVIDERS

### AUDITOR

PricewaterhouseCoopers Assurance, *société coopérative*, 2, rue Gerhard Mercator, B.P. 1443, L-1014 Luxembourg, Grand Duchy of Luxembourg act as Auditor.

REGISTRAR AND TRANSFER AGENT

The Management Company has undertaken to provide the SICAV with registrar and transfer agent services. As such the Management Company will be responsible for handling processing of subscriptions of Shares, dealing with requests for redemption and conversion, and accepting transfers of funds, for the safekeeping of the register of Shareholders of the SICAV and the safekeeping of all non-issued Share certificates of the SICAV.

The Management Company has delegated the registrar and transfer agent services to SS&C Administration Services Luxembourg S.A., 49, Avenue John F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg, pursuant to the Registrar and Transfer Agency Agreement. This agreement has been entered into for an unlimited duration and may be terminated as provided in such agreement.

DOMICILIARY, ADMINISTRATIVE, CORPORATE AND PAYING AGENT

The Management Company has undertaken to provide the SICAV with certain administration services, including general administration as well as accounting (bookkeeping and maintenance of all accounts of the SICAV), the calculation of the Net Asset Value per Share, the preparation and filing of the SICAV's financial reports, the liaison with the Auditors and client communication services.

In addition, the Management Company will, under the terms of the Management Company Services Agreement act as corporate and domiciliary agent for the SICAV.

The Management Company has delegated the above mentioned domiciliary and administrative functions to the Domiciliary and Administrative Agent (except for the client communication function) pursuant to the Administration Agency, Domiciliary, Corporate and Paying Agency Agreement, which was concluded for an unlimited duration and may be terminated as provided therein.

SHARE CLASS HEDGING AGENT

The Management Company has further appointed State Street Bank International GmbH to undertake certain currency hedging functions in respect of Hedged Share Classes.

DEPOSITARY

***Information about the Depositary***

The SICAV has appointed the Depositary as its depositary. The Depositary is a limited liability company with registered number HRB 42872 domiciled in Germany whose registered office is at Brienner Str. 59, D-80333 Munich. The Depositary conducts its principal business in Luxembourg from its branch office at 49, Avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg. Its Luxembourg branch is registered with the *Registre de Commerce et des Sociétés* of Luxembourg under number B 148186. State Street Bank International GmbH, Luxembourg Branch is authorised to provide its services in accordance with the Luxembourg law of 5 April 1993 on the financial sector, as amended, and is specialised in fund depositary and administration services.

The Depositary is in respect of its services as depositary in Luxembourg duly authorised and regulated by the CSSF.

***Terms of the Depositary Agreement***

The appointment of the Depositary has been made under a Depositary Agreement between the SICAV, the Management Company and the Depositary dated 23 February 2026.

Subject to the conditions set out in the Depositary Agreement, the Depositary Agreement may be terminated by not less than 90 days' written notice, although termination may be immediate in certain circumstances, such as the insolvency of the Depositary. Upon an (envisaged) removal or resignation of the Depositary, the SICAV shall with due observance of the applicable requirements of the CSSF and in accordance with applicable law, rules and regulations, appoint a successor depositary. The Depositary may not be replaced without the approval of the CSSF. In cases where the Depositary Agreement has been terminated but a new depositary has not been appointed at the expiry of the notice period referred to above, the Depositary shall take all the measures necessary for the proper preservation of the interests

of the Shareholders and shall keep open or, if required, shall open all accounts necessary for the safekeeping of the SICAV's assets until the completion of the liquidation process of the SICAV and its withdrawal from the list provided for in Article 130(1) of the 2010 Law.

The Depositary Agreement contains indemnities in favour of the Depositary excluding matters arising by reason of its failure to satisfy its obligation of due skill, care and diligence, or by reason of its negligence, intentional failure or fraud.

The Depositary is entitled to receive remuneration out of the assets of the SICAV for its services. This remuneration is included in the Operating Expenses, as explained in the section entitled “Fees and Expenses”.

***Key duties of the Depositary***

The SICAV has, under the terms of the Depositary Agreement, engaged the Depositary as depositary of the SICAV’s assets. The Depositary shall also be responsible for the oversight of the SICAV to the extent required by and in accordance with applicable law, rules and regulations. The Depositary shall exercise the supervisory duties in accordance with applicable law, rules and regulations as well as the Depositary Agreement.

The key duties of the Depositary consist of:

(i) monitoring and verifying the cash flows of the SICAV;

(ii) safekeeping of the assets of the SICAV including *inter alia* holding in custody financial instruments that may be held in custody and verification of ownership of other assets;

(iii) ensuring that the sale, issue, re-purchase, redemption and cancellation of Shares are carried out in accordance with the Articles and applicable Luxembourg law, rules and regulations;

(iv) ensuring that the value of the Shares is calculated in accordance with the Articles and applicable Luxembourg law, rules and regulations;

(v) ensuring that in transactions involving the assets of the SICAV, any consideration is remitted to the SICAV within the usual time limits;

(vi) ensuring that the income of the SICAV is applied in accordance with the Articles, applicable Luxembourg law, rules and regulations; and

(vii) carrying out instructions from the Management Company unless they conflict with the Articles, or applicable Luxembourg law, rules and regulations.

***Reuse of the SICAV’s assets by the Depositary***

Under the Depositary Agreement, the Depositary has agreed that it, and any person to whom it delegates custody functions, may not reuse any of the SICAV’s assets for their own account.

SICAV’s assets may be reused for the account of the SICAV where:

- The reuse of the SICAV’s assets is carried out for the account of the SICAV;
- The Depositary is instructed by the SICAV or the Management Company on behalf of the SICAV to reuse the SICAV’s assets;
- The reuse of the assets is for the benefit of the SICAV and the Shareholders;
- The transaction is covered by high quality and liquid collateral received by the SICAV under a title transfer arrangement;
- The market value of which shall, at all times, amount to at least the market value of the reused assets plus a premium.

***Liability of the Depositary***

As a general rule the Depositary is liable for any losses suffered as a result of the Depositary's negligence, fraud or wilful default to properly fulfil its obligations except that it will not be liable for any loss where, among others:

(i) the event which has led to the loss is not the result of any act, omission or default of the Depositary or of one of the Depositary's delegates;

(ii) it is due to a force majeure event; or

(iii) it results from the insolvency of the SICAV, the Management Company or any other person.

However, in the case of loss of a financial instrument by the Depositary, or by a third party, the Depositary is under an obligation to return a financial instrument of identical type or corresponding amount without undue delay unless it can prove that the loss arose as a result of an external event beyond the Depositary's reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary.

***Delegation of safekeeping function***

(1) Under the terms of the Depositary Agreement and in accordance with the 2010 Law, the Depositary has the power to delegate certain of its depositary functions.

(2) In order to discharge its responsibility in this regard, the Depositary must exercise due skill, care and diligence in the selection, continued appointment and ongoing monitoring of a third party as a safekeeping agent so as to ensure that the third party has and maintains the expertise, competence and standing appropriate to discharge the responsibilities concerned; maintain an appropriate level of supervision over the safekeeping agent; and make appropriate inquiries from time to time to confirm that the obligations of the agent continue to be competently discharged.

The liability of the Depositary will not be affected by the fact that it has delegated to a third party certain of its safekeeping in respect of the Fund's assets.

The use of securities settlement systems does not constitute a delegation by the Depositary of its functions.

(3) As at the date of this Prospectus, the Depositary has entered into written agreements delegating the performance of its safekeeping function in respect of certain of the SICAV' assets to delegates and sub-delegates. An updated list of those delegates and sub-delegates is available at the registered office of the SICAV or can be obtained from the Depositary upon request.

(4) Without prejudice to the "Conflicts of Interest" section below, from time to time actual or potential conflicts may arise between the Depositary and its delegates or sub-delegates, for example where an appointed delegate or sub-delegate is an affiliated group company which receives remuneration for another custodial service it provides to the SICAV.

Included in the Depositary's conflict of interest policy are procedures to identify, manage and monitor on an on-going basis any actual or potential conflict of interest involving its delegates or sub-delegates.

The Depositary will ensure that any such delegates or sub-delegates who are its affiliates are appointed on terms which are not materially less favourable to the SICAV than if the conflict or potential conflict had not existed.

***Conflicts of interest***

Actual or potential conflicts of interest may also arise between the SICAV, the Shareholders or the Management Company on the one hand and the Depositary on the other hand.

For example, such actual or potential conflict may arise because the Depositary is part of a legal entity or is related to a legal entity which provides other products or services to the SICAV or the Management Company. In particular, depositary and administration services are provided by the same legal entity, State Street Bank International GmbH, Luxembourg Branch. In practice, however, the depositary and administration lines of business are functionally

and hierarchically separated and operate on an arm's length basis. In addition, the Depositary may have a financial or business interest in the provision of such products or services, or receives remuneration for related products or services provided to the SICAV, or may have other clients whose interests may conflict with those of the SICAV, the Shareholders or the Management Company.

The Depositary and any of its affiliates may effect, and make a profit from, transactions in which the Depositary (or its affiliates, or another client of the Depositary or its affiliates) has (directly or indirectly) a material interest or a relationship of any description and which involves or may involve a potential conflict with the Depositary's duty to the SICAV. This includes circumstances in which the Depositary or any of its affiliates or connected persons: acts as market maker in the investments of the SICAV; provides broking services to the SICAV and/or to other funds or companies; acts as financial adviser, banker, derivatives counterparty or otherwise provides services to the issuer of the investments of the SICAV; acts in the same transaction as agent for more than one client; has a material interest in the issue of the investments of the SICAV; or earns profits from or has a financial or business interest in any of these activities.

The group-wide conflict of interest policy provides that Citi manages conflicts through various policies, procedures and/or processes, which may, depending upon the conflict, include prevention or avoidance of conflicts, or appropriate disclosures, establishing information barriers, restructuring transactions, products or processes, and/or changing compensation incentives. The Depositary has a conflict of interest policy in place to identify, manage and monitor on an on-going basis any actual or potential conflict of interest. The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the Depositary issues to be properly identified, managed and monitored.

In accordance with Luxembourg law, Shareholders may request an up to date statement regarding any of the information set out above from the Depositary.

## DATA PROTECTION

### THE DATA CONTROLLER

The data controller in respect of any personal information provided is the Management Company and the SICAV. In this privacy statement 'we', 'us' and 'our' means the Management Company and/or the SICAV.

### USES MADE OF PERSONAL INFORMATION

This Privacy Statement covers information ("personal information") about the investors, including Shareholders, distributors, dealers and intermediaries and their respective representatives, beneficial owners, and authorised signatories (together the "Investors" for the purpose of this Data Protection section) that is supplied to us. This information will typically include information such as name, address, telephone number, email address, gender, financial information and other information provided to us. Our legal basis to process this information includes doing so in order to comply with our legal obligations (e.g., for the purposes of the prevention of fraud or any other crime), to perform a contract between us and the Investors (e.g., manage and administer Shareholders' account (including but not limited to processing transactions, and contacting Shareholders with details of changes to the products bought), establish and defend any legal claims, or because the Investors have consented to our use of the information (e.g. offering new investment products). We may also process personal information because it is necessary for our legitimate business interests (e.g., for internal analysis and research), we may also process data in order to comply with legal or regulatory requirements.

### SHARING OF PERSONAL INFORMATION

The SICAV may use external third parties such as those described below to process personal information on its behalf in accordance with the purposes set out in this privacy statement.

The SICAV will delegate the processing of personal information to various entities, including the Management Company, the Domiciliary and Administrative Agent and the Registrar and Transfer Agent, and undertakes not to transfer the personal information to any other third parties, unless required by law or upon Shareholder consent. For the avoidance of doubt, if Investors do wish to exercise any of their individual data subject rights as set out in our privacy notice via their financial intermediary, then we will require a written authorisation before we can share any such personal information with the intermediary.

The personal information provided may also be shared with other organisations (including but not limited to governmental and/or tax authorities in Luxembourg) in order for us to comply with any legal or regulatory requirements (e.g., audit reporting and anti-money laundering checks) and, in addition (in respect of tax authorities, and where lawful to do so under data protection laws) where necessary for the purposes of ensuring that tax is paid correctly and that we receive refunds of tax already paid when this is due to us. We may also transfer personal information to appointed third party administrators, such as transfer agents, in order to process customer applications, carry out record keeping, dealing with subscriptions, switching, withdrawals and terminations, and certain communications. In addition, we may share information with the companies within the Threadneedle group of companies for the purposes set out in this privacy statement.

BUSINESS CHANGES

If the SICAV or the Threadneedle group of companies undergoes a group reorganisation or is sold to a third party, personal information may be transferred to that reorganised entity or third party and used for the purposes highlighted above.

OVERSEAS TRANSFERS

We may transfer personal information to countries located outside of the European Economic Area (the "**EEA**"), including to the United Kingdom, the United States and India. This may happen when our servers, suppliers and/or, service providers are based outside of the EEA. We may transfer information under certain circumstances (e.g., where it is necessary to perform our contract with the Investors). The data protection laws and other laws of these countries may not be as comprehensive as those that apply within the EEA – in these instances we will take steps to ensure that the Investor's privacy and confidentiality rights are respected. We implement measures such as standard data protection contractual clauses to ensure that any transferred personal information remains protected and secure. A copy of these clauses can be obtained by contacting us at the address listed below in the "Contact Information" section. Details of the countries relevant to the Investor will be provided upon request.

INVESTORS' INDIVIDUAL RIGHTS

With limited exceptions, Investors are entitled, in accordance with applicable law, to object to or request restriction of processing of their personal information, and to request access to, rectification, erasure and portability of their personal information. This service is provided free of charge unless requests are manifestly unfounded or excessive. In these circumstances, we reserve the right to charge a reasonable fee or, refuse to act on the request. Investors can write to us at the details provided in the Directory or by contacting us at the address listed below in the "Contact Information" section.

Investors are invited to inform us if any of the personal information that the SICAV holds about them is wrong.

Complaints may be lodged with the applicable regulator if Investors consider our processing of their personal information may infringe applicable law.

DATA SECURITY AND RETENTION

We maintain reasonable security measures to safeguard personal information from loss, interference, misuse, unauthorised access, disclosure, alteration or destruction. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

Personal information will be retained only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws. For more information on our data retention periods, please see our Privacy Notice at www.columbiathreadneedle.com/GDPR.

CONTACT INFORMATION

Investors can raise any issues regarding the processing of their personal information by contacting our Data Protection Officer at any time. For contact information, please see the Privacy Notice at www.columbiathreadneedle.com/GDPR.

## DOCUMENTS AVAILABLE FOR INSPECTION

Copies of the following contracts, which are governed by the laws of Luxembourg and are incorporated herein by reference, are available for inspection during normal business hours at the registered office of the SICAV:

(a) the Management Company Services Agreement;
(b) the Depositary Agreement;
(c) the Administration Agency, Domiciliary, Corporate and Paying Agency Agreement; and
(d) the Registrar and Transfer Agency Agreement.

The Agreements listed above may be amended at any time by mutual consent of the parties thereto.

A copy of the Prospectus, the PRIIPs KID, the most recent financial statements and the Articles may be obtained free of charge upon request at the registered office of the SICAV.

# APPENDIX A
## INVESTMENT RESTRICTIONS

The SICAV shall, based upon the principle of risk spreading, have power to determine the corporate and investment policy for the investments for each Portfolio, the Base Currency, as the case may be, and the course of conduct of the management and business affairs of the SICAV.

Except to the extent that more restrictive rules are provided for in connection with a specific Portfolio under "Investment Objectives and Policies" in the Prospectus, the investment policy of each Portfolio shall comply with the rules and restrictions laid down hereafter:

**A. Investments in the Portfolios shall consist solely of:**

(1) Transferable Securities and Money Market Instruments listed or dealt in on a Regulated Market;

(2) Transferable Securities and Money Market Instruments dealt in on an Other Regulated Market in a Member State;

(3) Transferable Securities and Money Market Instruments admitted to official listing on a stock exchange of an Other State or dealt in on an Other Regulated Market in an Other State;

(4) recently issued Transferable Securities and Money Market Instruments, provided that:

- the terms of issue include an undertaking that application will be made for admission to official listing on a stock exchange in an Other State or on a Regulated Market or on any Other Regulated Market as described under (1)-(3) above;

- such admission is secured within one year of issue;

(5) units of UCITS authorised according to the UCITS Directive (including shares of other Portfolios of the SICAV under the conditions set forth by Luxembourg laws and regulations) and/or other UCIs within the meaning of the first and second indent of Article 1 (2) of the UCITS Directive, whether situated in a Member State or in an Other State, provided that:

- such other UCIs are authorised under laws which provide that they are subject to supervision considered by the Regulatory Authority to be equivalent to that laid down in Community law, and that cooperation between authorities is sufficiently ensured;

- the level of protection for shareholders in such other UCIs is equivalent to that provided for shareholders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and short sales of Transferable Securities and Money Market Instruments are equivalent to the requirements of the UCITS Directive;

- the business of the other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period;

- no more than 10% of the net assets of the UCITS or of the other UCIs, whose acquisition is contemplated, can, according to their constitutional documents, in aggregate be invested in units of other UCITS or other UCIs;

(6) deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a Member State or, if the registered office of the credit institution is situated in an Other State, provided that it is subject to prudential rules considered by the Regulatory Authority as equivalent to those laid down in Community law;

(7) financial derivative instruments, *i.e.* in particular options, futures, including equivalent cash-settled instruments, dealt in on a Regulated Market or on an Other Regulated Market referred to in (1), (2) and (3) above, and/or financial derivative instruments dealt in over-the-counter ("OTC derivatives"), provided that:

(i) the underlying consists of instruments covered by this Section A., financial indices, interest rates, foreign exchange rates, Transferable Securities or currencies, in which the Portfolio may invest according to its investment objectives; the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the Regulatory Authority, and

(ii) the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the SICAV's initiative;

under no circumstances shall these operations cause the Portfolio to diverge from its investment objectives;

(8) Money Market Instruments other than those dealt on a Regulated Market or on an Other Regulated Market, to the extent that the issue or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided that such instruments are:

- issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the EU or the European Investment Bank, an Other State or, in case of a Federal State, by one of the members making up the federation, or by a public international body to which one or more Member States belong, or

- issued by an undertaking any securities of which are dealt in on Regulated Markets or on Other Regulated Markets referred to in (1), (2) or (3) above, or

- issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by Community law, or by an establishment which is subject to and complies with prudential rules considered by the Regulatory Authority to be at least as stringent as those laid down by Community law; or

- issued by other bodies belonging to the categories approved by the Regulatory Authority provided that investments in such instruments are subject to investor protection equivalent to that laid down in the three paragraphs directly above and provided that the issuer is a company whose capital and reserves amount to at least ten million Euro (10,000,000 Euro) and which presents and publishes its annual accounts in accordance with directive 78/660/EEC, is an entity which, within a Group of Companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

**B. Each Portfolio may however:**

(1) Invest up to 10% of its net assets in assets other than those referred to above under A(1) through (4) and (8);

(2) Hold up to 20% of its total net assets in ancillary liquid assets, limited to demand deposit accounts. Such restriction may temporarily be exceeded as necessary in case of exceptionally unfavourable market conditions if the SICAV considers this to be in the best interest of the Shareholders;

(3) Borrow up to 10% of its net assets, provided that such borrowings are made only on a temporary basis. Such borrowings may be used for liquidity purposes (e.g. to cover cash shortfall caused by mismatched settlement dates on purchase and sale transactions, finance repurchases or pay fees reverting to a service provider) and/or for investment purposes. The assets of the relevant Portfolio may be charged as security for any such borrowings in accordance with the principle of segregation of assets and liabilities provided by Article 181(5) of the 2010 Law. Collateral arrangements with respect to the writing of options or the

purchase or sale of forward or futures contracts are not deemed to constitute "borrowings" for the purpose of this restriction;

(4) Acquire foreign currency by means of a back-to-back loan.

**C. In addition, the SICAV shall comply in respect of the net assets of each Portfolio with the following investment restrictions per issuer:**

**(a) Risk Diversification rules**

For the purpose of calculating the restrictions described in (1) to (5), (8), (9), (13) and (14) hereunder, companies which are included in the same Group of Companies are regarded as a single issuer.

To the extent an issuer is a legal entity with multiple portfolios where the assets of a portfolio are exclusively reserved to the investors in such portfolio and to those creditors whose claim has arisen in connection with the creation, operation and liquidation of that portfolio, each portfolio is to be considered as a separate issuer for the purpose of the application of the risk spreading rules described under items (1) to (5), (7) to (9) and (12) to (14) hereunder.

- ***Transferable Securities and Money Market Instruments***

(1) No Portfolio may purchase additional Transferable Securities and Money Market Instruments of any single issuer if:

(i) upon such purchase more than 10% of its net assets would consist of Transferable Securities or Money Market Instruments of one single issuer; or

(ii) the total value of all Transferable Securities and Money Market Instruments of issuers in each of which it invests more than 5% of its net assets would exceed 40% of the value of its assets. This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

(2) A Portfolio may invest on a cumulative basis up to 20% of its net assets in Transferable Securities and Money Market Instruments issued by the same Group of Companies.

(3) The limit of 10% set forth above under (1)(i) is increased to 35% in respect of Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by its local authorities, by any Other State or by a public international body of which one or more Member State(s) are member(s).

(4) The limit of 10% set forth above under (1)(i) is increased up to 25% in respect of covered bonds as defined in point (1) of Article 3 of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision and amending Directives 2009/65/ EC and 2014/59/EU, and for certain bonds where they are issued before 8 July 2022 by a credit institution which has its registered office in a Member State and is subject by law, to special public supervision designed to protect bondholders. In particular, sums deriving from the issue of those bonds issued before 8 July 2022 shall be invested in accordance with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the reimbursement of the principal and payment of the accrued interest. Where the Portfolio invests more than 5% of its assets in the covered bonds (as defined above), the total value of such investments may not exceed 80% of the value of the assets of such Portfolio.

(5) The securities specified above under (3) and (4) are not to be included for purposes of computing the ceiling of 40% set forth above under (1)(ii).

(6) **Notwithstanding the ceilings set forth above, each Portfolio is authorised to invest, in accordance with the principle of risk spreading, up to 100% of its net assets in Transferable Securities and Money Market Instruments issued or guaranteed by a Member State, by its local authorities, by any other member state of the OECD such as the United States, or of the Group of twenty (G20), Singapore or Hong Kong or by a public international body of which one or more Member State(s)**

**are member(s), provided that (i) such securities are part of at least six different issues and (ii) the securities from any such issue do not account for more than 30% of the total assets of such Portfolio.**

(7) Without prejudice to the limits set forth hereunder under **(b),** the limits set forth in (1) are raised to a maximum of 20 % for investments in stocks and/or bonds issued by the same body when the aim of the Portfolio's investment policy is to replicate the composition of a certain stock or bond index which is recognised by the Regulatory Authority, on the following basis:

- the composition of the index is sufficiently diversified,
- the index represents an adequate benchmark for the market to which it refers,
- it is published in an appropriate manner.

The limit of 20% is raised to 35% where that proves to be justified by exceptional market conditions in particular in Regulated Markets where certain Transferable Securities or Money Market Instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.

- ***Bank Deposits***

(8) A Portfolio may not invest more than 20% of its net assets in deposits made with the same body.

- ***Derivative Instruments***

(9) The risk exposure to a counterparty in an OTC derivative transaction, including total/excess return swaps transactions, may not exceed 10% of the Portfolio's net assets when the counterparty is a credit institution referred to in A. (6) above or 5% of its net assets in other cases.

(10) Investment in financial derivative instruments shall only be made, and within the limits set forth in (2), (5) and (14), provided that the exposure to the underlying assets does not exceed in aggregate the investment limits set forth in (1) to (5), (8), (9), (13) and (14). When the Portfolio invests in index-based financial derivative instruments, these investments do not necessarily have to be combined to the limits set forth in (1) to (5), (8), (9), (13) and (14).

(11) When a Transferable Security or Money Market Instrument embeds a derivative, the latter must be taken into account when complying with the requirements of A (7) (ii) and C (a) (10) and (D) hereunder as well as with the risk exposure and information requirements laid down in the sales documents of the SICAV.

- ***Units of Open-Ended Funds***

Under the Law, no Portfolio may invest more than 20% of its net assets in the units of a single UCITS or other UCIs. However, the Portfolios will limit their investment in units of UCITS or other UCIs to 10% of their net assets unless otherwise specified within the Portfolio's investment objective and policy.

(12) For the purpose of the application of this investment limit, each portfolio of a UCI with multiple portfolios within the meaning of Article 181 of the 2010 Law is to be considered as a separate issuer provided that the principle of segregation of the obligations of the various portfolios vis-à-vis third parties is ensured. Investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net assets of a Portfolio.

When a Portfolio has acquired units of UCITS and/or other UCIs, the assets of the respective UCITS or other UCIs do not have to be combined for the purposes of the limits laid down in (1) to (5), (8), (9), (13) and (14).

When a Portfolio invests in the units of other UCITS and/or other UCIs that are managed, directly or by delegation, by the Management Company or any appointed Investment Manager or by any other company with which the Management Company or any appointed Investment Manager is linked by common management

or control, or by a substantial direct or indirect holding, the Management Company or any appointed Investment Manager or other company may not charge subscription or redemption fees on account of the Portfolio's investment in the units of such other UCITS and/or UCIs.

A Portfolio that invests a substantial proportion of its assets in other UCITS and/or other UCIs shall disclose in the Prospectus the maximum level of the asset management fee that may be charged both to the Portfolio itself and to the other UCITS and/or other UCIs in which it intends to invest. In its annual report, the SICAV shall indicate the maximum proportion of asset management fee charged both to the Portfolio itself and to the UCITS and/or other UCIs in which it invests.

- ***Combined limits***

(13) Notwithstanding the individual limits laid down in (1), (8) and (9) above, a Portfolio may not combine:

- investments in Transferable Securities or Money Market Instruments issued by;

- deposits made with, and/or;

- exposures arising from OTC derivative transactions undertaken,

with a single body in excess of 20% of its net assets.

(14) The limits set out in (1), (3), (4), (8), (9) and (13) above may not be combined, and thus investments in Transferable Securities or Money Market Instruments issued by the same body, in deposits or derivative instruments made with this body carried out in accordance with (1), (3), (4), (8), (9) and (13) above may not exceed a total of 35% of the net assets of each Portfolio of the SICAV.

**(b) Limitations on Control**

(15) No Portfolio may acquire such amount of shares carrying voting rights which would enable the SICAV to exercise a significant influence over the management of the issuer.

(16) Neither any Portfolio nor the SICAV as a whole may acquire (i) more than 10% of the outstanding non-voting shares of any one issuer; (ii) more than 10% of the outstanding debt securities of any one issuer; (iii) more than 10% of the Money Market Instruments of any one issuer; or (iv) more than 25% of the outstanding shares or units of any one UCITS and/or UCI.

The limits set forth in (ii) to (iv) may be disregarded at the time of acquisition if at that time the gross amount of bonds or of the Money Market Instruments or the net amount of the instruments in issue cannot be calculated.

The ceilings set forth above under (15) and (16) do not apply in respect of:

- Transferable Securities and Money Market Instruments issued or guaranteed by a Member State or by its local authorities;

- Transferable Securities and Money Market Instruments issued or guaranteed by any Other State;

- Transferable Securities and Money Market Instruments issued by a public international body of which one or more Member State(s) are member(s);

- shares in the capital of a company which is incorporated under or organised pursuant to the laws of an Other State provided that (i) such company invests its assets principally in securities issued by issuers of that State, (ii) pursuant to the laws of that State a participation by the relevant Portfolio in the equity of such company constitutes the only possible way to purchase securities of issuers of that State, and (iii) such company observes in its investment policy the restrictions set forth under C., items (1) to (5), (8), (9) and (12) to (16); and

- shares in the capital of subsidiary companies which, exclusively on behalf of the SICAV carry on only the business of management, advice or marketing in the country where the subsidiary is located, in regard to the redemption of Shares at the request of Shareholders.

**D. In addition, the SICAV shall comply in respect of its assets with the following investment restrictions per instrument:**

Except as otherwise stated therein, each Portfolio shall ensure that its Global Exposure relating to financial derivative instruments does not exceed its total net value.

The exposure is calculated taking into account the current value of the underlying assets, the counterparty risk, foreseeable market movements and the time available to liquidate the positions.

**E. Finally, the SICAV shall comply in respect of the assets of each Portfolio with the following investment restrictions:**

(1) No Portfolio may acquire commodities or precious metals or certificates representative thereof. For the avoidance of doubt, transactions in foreign currencies, financial instruments, indices, or Transferable Securities as well as futures and forward contracts, options and swaps are not considered as commodities for the purposes of this restriction.

(2) No Portfolio may invest in real estate provided that investments may be made in securities secured by real estate or interests therein or issued by companies which invest in real estate or interests therein.

(3) No Portfolio may issue warrants or other rights to subscribe for its Shares.

(4) A Portfolio may not grant loans or guarantees in favour of a third party, provided that such restriction shall not prevent each Portfolio from investing in non-fully paid-up Transferable Securities, Money Market Instruments or other financial instruments, as mentioned under A., items (5), (7) and (8).

(5) The SICAV may not enter into uncovered sales of Transferable Securities, Money Market Instruments or other financial instruments.

**F. Notwithstanding anything to the contrary herein contained:**

(1) The ceilings set forth above may be disregarded by each Portfolio when exercising subscription rights attaching to Transferable Securities and Money Market Instruments in such Portfolio's portfolio.

(2) If such ceilings are exceeded for reasons beyond the control of a Portfolio or as a result of the exercise of subscription rights, such Portfolio must adopt as its priority objective in its sale transactions the remedying of such situation, taking due account of the interests of its Shareholders.

The SICAV has the right to determine additional investment restrictions to the extent that those restrictions are necessary to comply with the laws and regulations of countries where Shares of the SICAV are offered or sold.

**G. Global Exposure and Risk Management**

In accordance with CSSF Circular 11/512 and article 13 of CSSF Regulation 10-4, the SICAV must employ a risk management process which enables it to monitor and measure at any time the risk of the positions in its Portfolios and their contribution to the overall risk profile of its Portfolios.

In relation to financial derivative instruments the SICAV must employ a process (or processes) for accurate and independent assessment of the value of OTC derivatives and the SICAV shall ensure for each Portfolio that its Global Exposure relating to financial derivative instruments does not exceed the total net value of its portfolio.

Except as otherwise noted below, each Portfolio may invest, according to its investment policy and within the limits laid down in Appendix A and in Appendix B.I in financial derivative instruments (including

options, forwards, futures and/or swaps (including credit default swaps, credit default swaps on eligible loan indices, interest rate swaps and total/excess return swaps) on Transferable Securities and/or any financial instruments and currencies) provided that the exposure to the underlying assets does not exceed in aggregate the investment limits laid down in Appendix A. Certain Portfolios may use financial derivative instruments as a principal investment objective, as more fully described in the investment policy of each relevant Portfolio. Shareholders should be aware that the use of derivative instruments as a principal investment objective carries a greater degree of risk.

When a Portfolio invests in index-based financial derivative instruments, these investments do not necessarily have to be combined to the limits laid down in Appendix A item C(a)(1)-(5), (8), (9), (13) and (14).

When a Transferable Security or Money Market Instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this Section.

Whenever risk management processes adequate to perform the functions described above are employed on behalf of the SICAV by the Management Company and/or Investment Managers in managing the Portfolios, they are deemed to be employed by the SICAV.

As a consequence of the above, the Management Company has implemented procedures to ensure that all the day-to-day duties concerning active risk management of the Portfolio(s) are being carried out by the Investment Managers and Depositary. The oversight process is performed by the conducting officer(s) of the Management Company (the "**Conducting Officers**") and the investment risk committee ("**RMC**"). These individuals along with other resources monitor reports that are provided by the Investment Managers as well as the Depositary. Such reports are at a minimum received monthly. The individuals involved in such risk management monitoring are located in London at Threadneedle Asset Management Limited. All relevant documents are made available to a Luxembourg-resident Conducting Officer(s).

Information about the risk management process used by the Management Company to monitor and measure the risk of the positions and their contribution to the overall risk profile of each Portfolio is set out in the "Risk Factors" section of this Prospectus.

In addition to the above:

(1) The SICAV will not make direct investments in Russia (*i.e.*, Russian securities that are physically deposited with Russian transfer agents) which exceed 10% of the Net Asset Value of each Portfolio, at the time of purchase except for Transferable Securities and Money Market Instruments which are listed or traded on the MICEX-RTS exchange, which is recognised as an Other Regulated Market.

(2) Important information for Italian investors-
The local documents that Italian investors receive prior to subscribing in Shares may provide:

a. the ability for investors to appoint a distributor or a local paying agent to send orders in its own name on behalf of the investors and to be recorded as holder of the Shares on behalf of the effective underlying Shareholder (a so called nominee arrangement); and/or
b. the possibility for local paying agents to charge a fee to investors in relation to the execution and subscription, redemption and/or exchange transactions; and/or
c. the possibility for Italian investors to subscribe the SICAV shares through regular saving plans.

(3) For investors in France, the European Smaller Companies Portfolio is an eligible investment for a *plan d'épargne en actions* ("**PEA**"). This means the Portfolio has at least 75% of its Net Asset Value invested in the equity of corporate issuers with their registered office in an EEA country.

The Directors reserve the right to cease managing the above Portfolio so that it is eligible for investment through a PEA should it determine that doing so would no longer enable the Portfolio to comply with its investment objectives, not be in the interests of all Shareholders in the Portfolio or be impractical due to changing market conditions. Should the Directors decide to cease managing the Portfolio so that it is eligible for investment through a PEA, the Directors will notify the registered Shareholders resident in France at least one month in advance of the Portfolio ceasing to be managed to be eligible for investment through a PEA.

(4) Information for investors in Spain

The SICAV is duly authorised for its marketing in Spain under registered number 177 for such purposes with the Register of Foreign Collective Investment Schemes of the Comisión Nacional del Mercado de Valores (CNMV), in accordance with section 15.2 of Law 35/2003 of 4 November 2003 on Collective Investment Schemes, as amended.

(5) Information for investors in Germany

The following Portfolios are categorised in relation to the German Investment Tax Act ("InvStG") as "Mixed Funds" continuously investing at least 25% of their value in equity participations within the meaning of Sec. 2 (8) InvStG (e.g. equities):

- Global Dynamic Real Return
- Global Multi Asset Income
- Pan European Absolute Alpha

The following Portfolios are categorised in relation to the German Investment Tax Act ("InvStG") as "Equity Funds" continuously investing at least 51% of its value in equity participations within the meaning of Sec. 2 (8) InvStG (e.g. equities):

- American
- American Extended Alpha
- American Select
- American Smaller Companies
- Asia Equities
- Asian Equity Income
- European Select
- European Smaller Companies
- Global Emerging Market Equities
- Sustainable Global Equity Income
- Global Extended Alpha
- Global Focus
- Global Select
- Global Smaller Companies
- Global Technology
- Japan Equities
- Pan European Equities
- Pan European Focus
- Pan European Small Cap Opportunities
- Pan European Smaller Companies
- UK Equities
- UK Equity Income
- US Contrarian Core Equities
- US Disciplined Core Equities

*Definition of the Expression "Connected Person"*

The expression "Connected Person" in relation to the SICAV, any Investment Manager appointed by the SICAV or the Management Company (a "**Investment Manager**") or any company appointed for the purpose of distributing Shares or the Depositary (the relevant such SICAV being referred to below as "the relevant SICAV") means:

(a) any person or company beneficially owning, directly or indirectly, 20% or more of the ordinary share capital of the relevant SICAV, or able to exercise directly or indirectly 20% or more of the total votes in the relevant SICAV;

(b) any person or company controlled by a person who falls within (a) above;

(c) any company 20% or more of whose ordinary share capital is beneficially owned, directly or indirectly, by the relevant company and each of the others of the Management Company and Investment Manager and taken together or by the Depositary and any company 20% or more of the total votes of which can be exercised, directly, or indirectly by the relevant SICAV and each of the others of the Management Company and Investment Manager taken together or by the Depositary; and

(d) any director or officer of the relevant SICAV or any Connected Person of the relevant SICAV, as defined in (a), (b) or (c) above.

# APPENDIX B
## INVESTMENT TECHNIQUES AND INSTRUMENTS

The SICAV may employ techniques and instruments relating to Transferable Securities and other financial liquid assets for efficient portfolio management and hedging purposes within the conditions and limits of the relevant Regulatory Authority regulation.

When these operations concern the use of derivative instruments, these conditions and limits shall conform to the provisions laid down in Appendix A "Investment Restrictions".

Under no circumstances shall these operations cause a Portfolio to diverge from its investment objectives as laid down under "Investment Objectives and Policies" in the Prospectus.

The techniques and instruments that may be used include, without being limited to, the following:

### I. CREDIT DEFAULT SWAPS, INTEREST RATE SWAPS AND TOTAL/EXCESS RETURN SWAPS

Some Portfolios may enter into credit default swaps:

A credit default swap is a bilateral financial contract in which one counterparty (the protection buyer) pays a periodic fee in return for a contingent payment by the protection seller following a credit event of a reference issuer. The protection buyer acquires the right to sell a particular bond or other designated reference obligations issued by the reference issuer for its par value or the right to receive the difference between the par value and the market price of the said bond or other designated reference obligations when a credit event occurs. A credit event is commonly defined as bankruptcy, insolvency, receivership, material adverse restructuring of debt, or failure to meet payment obligations when due.

Provided it is in its exclusive interest, the relevant Portfolios may sell protection under credit default swaps (individually a "credit default swap Sale Transaction", collectively the “credit default swap Sale Transactions”) in order to acquire a specific credit exposure.

In addition, the relevant Portfolios may, provided it is in its exclusive interest, buy protection under credit default swaps (individually a "credit default swap Purchase Transaction", collectively the “credit default swap Purchase Transactions”) without holding the underlying assets.

Such swap transactions must be effected with first class financial institutions specialising in this type of transaction and executed on the basis of standardised documentation such as the International Swaps and Derivatives Association (ISDA) Master Agreement.

The relevant Portfolios must ensure adequate coverage of commitments linked to such credit default swap and maintain sufficient liquidity to honour redemption requests from investors.

Furthermore, some Portfolios may enter into interest rate swaps. The use of total/excess return swaps is only authorised, both for hedging and investment purposes, where and as indicated in the respective investment policy of each Portfolio.

In accordance with Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse, this Prospectus contains a general description of total return swaps.

A total return swap is a transaction in which one party (“**the First Party**”) makes an initial payment equal to the value of a loan, debt security or other financial instrument (the “**Reference Obligation**”) issued, guaranteed or otherwise entered into by a third party (the “**Reference Entity**”) to the other party (“**the Second Party**”). The Second Party shall pay to the First Party the total economic performance of the Reference Obligation; that is, the market value of the

Reference Obligation at the maturity of the transaction (this will typically, absent default or another referenced event, be the notional amount of the Reference Obligation if the total return swap is linked to the maturity of the Reference Obligation) and any interest, dividend and fee payments, as applicable, on the Reference Obligation. An excess return swap is a transaction where the performance of a designated asset over a prescribed period is paid on termination of the transaction. Fees that are being incurred when entering into the total/excess return swap or when the notional amount is changed are deducted from the amount received or added to the amount paid to the counterparty to the swap.

Where a Portfolio enters into a total return swap or invests in other financial derivative instruments with similar characteristics, the assets held by the Portfolio shall comply with the investment limits set out in Articles 52, 53, 54, 55 and 56 of the UCITS Directive. For example, when a Portfolio enters into an unfunded swap, the Portfolio's investment portfolio that is swapped out shall comply with the aforementioned investment limits.

In accordance with Article 51(3) of the UCITS Directive and Article 43(5) of Directive 2010/43/EU, where a Portfolio enters into a total return swap or invests in other financial derivative instruments with similar characteristics, the underlying exposures of the financial derivative instruments shall be taken into account to calculate the investment limits laid down in Article 52 of the UCITS Directive

In addition, it shall be noted that, whenever a Portfolio uses total return swaps, the relevant counterparty(ies) shall have no discretion over the composition or management of the Portfolio's investment portfolio or of the underlying of the financial derivative instrument; the approval of the counterparty is not required to any Portfolio investment portfolio transaction.

Such swap transactions must be effected with credit institutions or their affiliated brokers established in a country belonging to the Group of ten or a member state of the EEA and which have at least an investment grade rating.

REVENUES PAID TO THE PORTFOLIOS

All revenues from the use of total return swaps will be returned to the relevant Portfolio, as the Management Company will not take any fees or costs out of those revenues additional to the Asset Management Fee and Operating Expenses.

## II- EFFICIENT PORTFOLIO MANAGEMENT TECHNIQUES AND INSTRUMENTS

GENERAL

The SICAV may use efficient portfolio management techniques and instruments provided that they comply with the provisions of CSSF Circular 08/356 and the following rules. For the avoidance of doubt, the SICAV does not engage in any repurchase and reverse repurchase transactions.

Techniques and instruments relating to Transferable Securities and Money Market Instruments used for efficient portfolio management shall not:

a) result in a change of the declared investment objective of the Portfolio; or
b) add substantial supplementary risks in comparison to the risk policy as described in this Prospectus.

All the revenues arising from efficient portfolio management techniques, net of direct and indirect operational costs, will be returned to the SICAV.

The use of techniques and instruments by the SICAV for efficient portfolio management shall not affect the SICAV's ability to meet, at all times, its redemption obligations.

1. LENDING OF PORTFOLIO SECURITIES

Unless the Prospectus is amended otherwise, the SICAV will not engage in any securities lending transactions for efficient portfolio management.

2. WHEN-ISSUED SECURITIES AND DELAYED DELIVERY TRANSACTIONS

Each Portfolio may purchase securities on a when-issued basis, and it may purchase or sell securities for delayed delivery. These transactions occur when securities are purchased or sold by the Portfolio with payment and delivery taking place in the future to secure what is considered an advantageous yield and price to the Portfolio at the time of entering into the transactions. Each Portfolio will maintain a segregated account with its Depositary of cash or liquid securities of governmental entities in an aggregate equal to the amount of its commitments in connection with such purchase transactions.

## III. WARRANTS

The Global Dynamic Real Return Portfolio, the Equity Portfolios and some Bond Portfolios may invest in warrants to purchase common stock. The gearing effect of investments in warrants and the volatility of warrant prices make the risks attached to investments in warrants higher than is the case with investments in equities.

## IV. POOLING

The SICAV may invest and manage all or any part of the assets established for two or more Portfolios (for the purposes hereof "**Participating Portfolios**") on a pooled basis. Any such asset pool shall be formed by transferring to it cash or other assets (subject to such assets being appropriate in respect of the investment policy of the pool concerned) from each of the Participating Portfolios. Thereafter, the SICAV may from time to time make further transfers to each asset pool. Assets may also be transferred back to a Participating Portfolio up to the amount of the participation of the Portfolio concerned. The share of a Participating Portfolio in an asset pool shall be measured by reference to notional units of equal value in the asset pool. On formation of an asset pool, the SICAV shall determine the initial value of notional units (which shall be expressed in such currency as the SICAV may consider appropriate) and shall allocate to each Participating Portfolio notional units having an aggregate value equal to the amount of cash (or the value of other assets) contributed. Thereafter, the value of the units shall be determined by dividing the net assets of the asset pool by the number of notional units existing.

When additional cash or assets are contributed to or withdrawn from an asset pool, the allocation of notional units of the Participating Portfolio concerned will be increased or reduced, as the case may be, by a number of notional units determined by dividing the amount of cash or the value of assets contributed or withdrawn by the current value of a unit in such asset pool. Where a contribution is made in cash, it may be treated for the purpose of this calculation as reduced by an amount which the SICAV considers appropriate to reflect fiscal charges and dealing and purchase costs which may be incurred in investing the cash concerned; in the case of cash withdrawal, a corresponding deduction may be made to reflect costs which may be incurred in realising securities or other assets of the asset pool.

Dividends, interest and other distributions of an income nature earned in respect of the assets in an asset pool will be applied to such asset pool and cause the respective net assets to increase. Upon the dissolution of the SICAV, the assets in an asset pool will be allocated to the Participating Portfolios in proportion to their respective participation in the asset pool.

# APPENDIX C
## PORTFOLIO CHARGES

## A SHARES:

| Portfolio (s) | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Bond Portfolios** | Maximum 3.0% | Maximum 0.75% |
| **Equity Portfolios and Asset Allocation Portfolios** | Maximum 5.0% | Maximum 0.75% |
| **Extended Alpha Portfolios** | Maximum 5.0% | Maximum 0.75% |
| **Absolute Return Portfolios** | Maximum 5.0% | Maximum 0.75% |
| **Specialist Portfolio** | Maximum 5.0% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Strategic Bond** | **0.90%** | **0.20%** | EUR |
| | **European Social Bond** | **0.40%** | **0.15%** | EUR |
| | **Global Corporate Bond** | **0.60%** | **0.20%** | USD |
| | **Emerging Market Corporate Bonds** | **1.35%** | **0.20%** | USD |
| | **Emerging Market Debt** | **1.35%** | **0.20%** | USD |
| | **European Corporate Bond** | **0.60%** | **0.20%** | EUR |
| | **European High Yield Bond** | **1.25%** | **0.20%** | EUR |
| | **European Short-Term High Yield Bond** | **0.75%** | **0.15%** | EUR |
| | **Global Emerging Market Short-Term Bonds** | **1.30%** | **0.20%** | USD |
| | **Flexible Asian Bond** | **0.90%** | **0.20%** | USD |
| **Asset Allocation Portfolios** | | | | |
| | **Global Dynamic Real Return** | **1.35%** | **0.30%** | USD |
| | **Global Multi Asset Income** | **1.25%** | **0.30%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **1.50%** | **0.20%** | USD |
| | **Global Emerging Market Equities** | **1.50%** | **0.20%** | USD |
| | **Sustainable Global Equity Income** | **1.50%** | **0.20%** | USD |
| | **Global Select** | **1.50%** | **0.20%** | USD |
| | **Global Smaller Companies** | **1.50%** | **0.30%** | EUR |
| | **American** | **1.50%** | **0.30%** | USD |
| | **American Select** | **1.50%** | **0.30%** | USD |
| | **American Smaller Companies** | **1.50%** | **0.30%** | USD |
| | **Asia Equities** | **1.50%** | **0.30%** | USD |
| | **US Contrarian Core Equities** | **1.50%** | **0.35%** | USD |
| | **US Disciplined Core Equities** | **0.55%** | **0.15%** | USD |
| | **Pan European Equities** | **1.30%** | **0.20%** | EUR |
| | **Pan European Focus** | **1.50%** | **0.20%** | EUR |
| | **Pan European Small Cap Opportunities** | **1.50%** | **0.35%** | EUR |
| | **European Select** | **1.50%** | **0.30%** | EUR |
| | **Asian Equity Income** | **1.50%** | **0.30%** | USD |
| | **Global Technology** | **1.65%** | **0.30%** | USD |
| | **UK Equities** | **1.50%** | **0.30%** | GBP |
| | **UK Equity Income** | **1.50%** | **0.30%** | GBP |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| | **Japan Equities** | **1.40%** | **0.20%** | JPY |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **1.50%** | **0.30%** | USD |
| | **Global Extended Alpha** | **1.50%** | **0.30%** | USD |
| | **Global Real Estate Securities** | **1.50%** | **0.20%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Credit Opportunities** | **1.00%** | **0.20%** | EUR |
| | **Pan European Absolute Alpha** | **1.50%** | **0.35%** | EUR |
| **Specialist Portfolio** | | | | |
| | **Enhanced Commodities** | **1.00%** | **0.20%** | USD |

## APPENDIX D
## PORTFOLIO CHARGES

### B SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | Nil |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Distribution Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|---|
| | **Global Technology*** | **2.00%** | **Nil** | **0.35%** | USD |

***B Shares of the Global Technology Portfolio are available only for further subscription by existing Shareholders.**

# APPENDIX E
## PORTFOLIO CHARGES

## D SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 1.00% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Strategic Bond** | **1.45%** | **0.20%** | EUR |
| | **Global Corporate Bond** | **1.35%** | **0.20%** | USD |
| | **Emerging Market Corporate Bonds** | **1.45%** | **0.20%** | USD |
| | **Emerging Market Debt** | **1.45%** | **0.20%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **1.45%** | **0.20%** | USD |
| | **Flexible Asian Bond** | **1.20%** | **0.20%** | USD |
| | **European Short-Term High Yield Bond** | **1.20%** | **0.15%** | EUR |
| **Asset Allocation Portfolios** | | | | |
| | **Global Dynamic Real Return** | **2.00%** | **0.30%** | USD |
| | **Global Multi Asset Income** | **2.00%** | **0.30%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **2.25%** | **0.20%** | USD |
| | **Global Emerging Market Equities** | **2.25%** | **0.20%** | USD |
| | **Sustainable Global Equity Income** | **2.00%** | **0.20%** | USD |
| | **Global Select** | **2.00%** | **0.20%** | USD |
| | **Global Smaller Companies** | **2.00%** | **0.30%** | EUR |
| | **American** | **1.85%** | **0.30%** | USD |
| | **American Select** | **2.25%** | **0.30%** | USD |
| | **American Smaller Companies** | **2.00%** | **0.30%** | USD |
| | **Asia Equities** | **2.00%** | **0.30%** | USD |
| | **US Contrarian Core Equities** | **2.00%** | **0.35%** | USD |
| | **US Disciplined Core Equities** | **0.75%** | **0.15%** | USD |
| | **Pan European Equities** | **1.50%** | **0.20%** | EUR |
| | **Pan European Focus** | **1.85%** | **0.20%** | EUR |
| | **Pan European Small Cap Opportunities** | **2.40%** | **0.35%** | EUR |
| | **European Select** | **2.00%** | **0.35%** | EUR |
| | **Asian Equity Income** | **2.25%** | **0.30%** | USD |
| | **Global Technology** | **2.00%** | **0.30%** | USD |
| | **UK Equities** | **2.25%** | **0.35%** | GBP |
| | **UK Equity Income** | **2.25%** | **0.30%** | GBP |
| | **Japan Equities** | **2.00%** | **0.20%** | JPY |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **2.00%** | **0.30%** | USD |
| | **Global Extended Alpha** | **2.00%** | **0.30%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Pan European Absolute Alpha** | **2.00%** | **0.35%** | EUR |
| **Specialist Portfolio** | | | | |
| | **Enhanced Commodities** | **1.25%** | **0.20%** | USD |

# APPENDIX F
## PORTFOLIO CHARGES

## I SHARES:

| | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | Maximum 0.75% |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Social Bond** | **0.30%** | **0.10%** | EUR |
| | **European Strategic Bond** | **0.40%** | **0.10%** | EUR |
| | **Global Corporate Bond** | **0.40%** | **0.10%** | USD |
| | **European Corporate Bond** | **0.40%** | **0.10%** | EUR |
| | **European High Yield Bond** | **0.55%** | **0.10%** | EUR |
| | **European Short-Term High Yield Bond** | **0.40%** | **0.10%** | EUR |
| | **Emerging Market Corporate Bonds** | **0.65%** | **0.10%** | USD |
| | **Emerging Market Debt** | **0.65%** | **0.10%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **0.65%** | **0.10%** | USD |
| | **US High Yield Bond** | **0.45%** | **0.10%** | USD |
| | **Flexible Asian Bond** | **0.40%** | **0.10%** | USD |
| **Asset Allocation Portfolios** | | | | |
| | **Global Dynamic Real Return** | **0.75%** | **0.20%** | USD |
| | **Global Multi Asset Income** | **0.65%** | **0.20%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **0.75%** | **0.10%** | USD |
| | **Global Emerging Market Equities** | **0.75%** | **0.10%** | USD |
| | **Sustainable Global Equity Income** | **0.60%** | **0.10%** | USD |
| | **Global Select** | **0.75%** | **0.10%** | USD |
| | **Global Smaller Companies** | **0.75%** | **0.20%** | EUR |
| | **American** | **0.70%** | **0.20%** | USD |
| | **American Select** | **0.80%** | **0.10%** | USD |
| | **American Smaller Companies** | **0.75%** | **0.20%** | USD |
| | **Asia Equities** | **0.75%** | **0.20%** | USD |
| | **US Contrarian Core Equities** | **0.80%** | **0.20%**[27] | USD |
| | **US Disciplined Core Equities** | **0.25%** | **0.10%** | USD |
| | **Pan European Equities** | **0.65%** | **0.10%** | EUR |
| | **Pan European Focus** | **0.50%** | **0.10%** | EUR |
| | **Pan European Small Cap Opportunities** | **0.85%** | **0.25%** | EUR |
| | **Pan European Smaller Companies** | **0.75%** | **0.20%** | EUR |
| | **European Select** | **0.75%** | **0.20%** | EUR |
| | **European Smaller Companies** | **0.75%** | **0.20%** | EUR |
| | **Asian Equity Income** | **0.75%** | **0.10%** | USD |
| | **Global Technology** | **0.85%** | **0.10%** | USD |
| | **UK Equities** | **0.65%** | **0.20%** | GBP |
| | **UK Equity Income** | **0.65%** | **0.20%** | GBP |
| | **Japan Equities** | **0.60%** | **0.10%** | JPY |

[27] Effective 1 April 2026, the Operating Expenses will be reduced to 0.20%. Until 31 March 2026 inclusive, the Operating Expenses is 0.25%.

| | | | | |
|---|---|---|---|---|
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.15%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.15%** | USD |
| | **Global Real Estate Securities** | **0.55%** | **0.10%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Credit Opportunities** | **0.50%** | **0.10%** | EUR |
| | **Pan European Absolute Alpha** | **0.75%** | **0.20%** | EUR |
| **Specialist Portfolio** | | | | |
| | **Enhanced Commodities** | **0.80%** | **0.10%** | USD |

# APPENDIX G
## PORTFOLIO CHARGES

## L SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | **N/A** | Maximum 0.75% |

Sales charges are maximums which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Social Bond** | **0.30%** | **0.10%** | EUR |
| | **Emerging Market Corporate Bonds** | **0.20%** | **0.10%** | USD |
| | **Emerging Market Debt** | **0.20%** | **0.10%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **0.20%** | **0.10%** | USD |
| | **European Short-Term High Yield Bond** | **0.20%** | **0.10%** | EUR |
| | **US High Yield Bond** | **0.20%** | **0.10%** | USD |
| | | | | |
| **Equity Portfolios** | | | | |
| | **UK Equity Income** | **0.50%** | **0.20%** | GBP |
| | **Japan Equities** | **0.35%** | **0.10%** | JPY |
| | **Asian Equity Income** | **0.25%** | **0.20%** | USD |
| | **Pan European Focus** | **0.25%** | **0.10%** | EUR |
| | **Sustainable Global Equity Income** | **0.25%** | **0.10%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Pan European Absolute Alpha** | **0.375%** | **0.20%** | EUR |

# APPENDIX H
## PORTFOLIO CHARGES

### M SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.00% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Equity Portfolios** | | | | |
| | **Japan Equities** | **0.35%** | **0.15%** | JPY |
| | **Pan European Focus** | **0.25%** | **0.15%** | EUR |

# APPENDIX I
## PORTFOLIO CHARGES

### N SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | Maximum 0.75% |

Sales charges are maximums which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Social Bond** | **0.30%** | **0.10%** | EUR |
| | **European Corporate Bond** | **0.08%** | **0.10%** | EUR |
| | **Global Corporate Bond** | **0.30%** | **0.10%** | USD |
| **Equity Portfolios** | | | | |
| | **American Smaller Companies** | **0.40%** | **0.20%** | USD |
| | **Global Smaller Companies** | **0.45%** | **0.20%** | EUR |
| | **Global Focus** | **0.44%** | **0.10%** | USD |
| | **Global Technology** | **0.60%** | **0.10%** | USD |
| | **UK Equities** | **0.60%** | **0.08%** | GBP |
| | **US Disciplined Core Equities** | **0.10%** | **0.10%** | USD |
| | **US Contrarian Core Equities** | **0.50%** | **0.10%** | USD |
| **Specialist Portfolio** | | | | |
| | **Enhanced Commodities** | **0.45%** | **0.10%** | USD |

# APPENDIX J
## PORTFOLIO CHARGES

### S SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.0% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **Emerging Market Debt** | **1.50%** | **0.20%** | USD |

# APPENDIX K
## PORTFOLIO CHARGES

### T SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.0% | Maximum 0.75% |

Sales charges are maximums which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **0.08%** | **0.15%** | EUR |
| | **US High Yield Bond** | **0.45%** | **0.10%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **0.44%** | **0.15%** | USD |
| | **UK Equities** | **0.60%** | **0.12%** | GBP |

# APPENDIX L
## PORTFOLIO CHARGES

## W SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.0% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Strategic Bond** | **0.85%** | **0.30%** | EUR |
| | **Global Corporate Bond** | **0.75%** | **0.30%** | USD |
| | **Emerging Market Corporate Bonds** | **1.00%** | **0.20%** | USD |
| | **Emerging Market Debt** | **1.00%** | **0.20%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **1.15%** | **0.30%** | USD |
| | **US High Yield Bond** | **1.25%** | **0.30%** | USD |
| **Asset Allocation Portfolio** | | | | |
| | **Global Dynamic Real Return** | **1.40%** | **0.35%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **1.40%** | **0.20%** | USD |
| | **Global Emerging Market Equities** | **1.65%** | **0.20%** | USD |
| | **American** | **1.15%** | **0.35%** | USD |
| | **American Select** | **1.40%** | **0.35%** | USD |
| | **European Select** | **1.00%** | **0.35%** | EUR |
| | **Pan European Equities** | **1.40%** | **0.20%** | EUR |
| | **Pan European Small Cap Opportunities** | **1.55%** | **0.35%** | EUR |
| | **Asian Equity Income** | **1.65%** | **0.35%** | USD |

# APPENDIX M
## PORTFOLIO CHARGES

## X SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | Maximum 0.75% |

***FOR THE AVOIDANCE OF DOUBT THERE ARE NO ASSET MANAGEMENT FEES FOR X SHARES***

| Portfolio Type | Name of Portfolio | Operating Expenses | Base Currency |
|---|---|---|---|
| **Bond Portfolios** | | | |
| | **European Social Bond** | **0.10%** | EUR |
| | **European Strategic Bond** | **0.10%** | EUR |
| | **Global Corporate Bond** | **0.10%** | USD |
| | **European Corporate Bond** | **0.10%** | EUR |
| | **European High Yield Bond** | **0.10%** | EUR |
| | **European Short-Term High Yield Bond** | **0.10%** | EUR |
| | **Emerging Market Corporate Bonds** | **0.10%** | USD |
| | **Emerging Market Debt** | **0.10%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **0.10%** | USD |
| | **US High Yield Bond** | **0.10%** | USD |
| | **Flexible Asian Bond** | **0.10%** | USD |
| **Asset Allocation Portfolios** | | | |
| | **Global Dynamic Real Return** | **0.15%** | USD |
| | **Global Multi Asset Income** | **0.15%** | USD |
| **Equity Portfolios** | | | |
| | **Global Focus** | **0.10%** | USD |
| | **Global Emerging Market Equities** | **0.10%** | USD |
| | **Sustainable Global Equity Income** | **0.10%** | USD |
| | **Global Select** | **0.10%** | USD |
| | **Global Smaller Companies** | **0.15%** | EUR |
| | **American** | **0.15%** | USD |
| | **American Smaller Companies** | **0.15%** | USD |
| | **Asia Equities** | **0.15%** | USD |
| | **American Select** | **0.10%** | USD |
| | **US Contrarian Core Equities** | **0.15%** | USD |
| | **US Disciplined Core Equities** | **0.10%** | USD |
| | **European Smaller Companies** | **0.15%** | EUR |
| | **Pan European Focus** | **0.15%** | EUR |
| | **Pan European Equities** | **0.10%** | EUR |
| | **Pan European Small Cap Opportunities** | **0.15%** | EUR |
| | **Pan European Smaller Companies** | **0.15%** | EUR |
| | **European Select** | **0.15%** | EUR |
| | **Asian Equity Income** | **0.10%** | USD |
| | **Global Technology** | **0.10%** | USD |
| | **UK Equities** | **0.15%** | GBP |
| | **UK Equity Income** | **0.15%** | GBP |
| | **Japan Equities** | **0.10%** | JPY |
| **Extended Alpha Portfolios** | | | |
| | **American Extended Alpha** | **0.15%** | USD |
| | **Global Extended Alpha** | **0.15%** | USD |

| | | | |
|---|---|---|---|
| | **Global Real Estate Securities** | **0.10%** | USD |
| **Absolute Return Portfolios** | | | |
| | **Credit Opportunities** | **0.15%** | EUR |
| | **Pan European Absolute Alpha** | **0.15%** | EUR |
| **Specialist Portfolio** | | | |
| | **Enhanced Commodities** | **0.10%** | USD |

# APPENDIX N
## PORTFOLIO CHARGES

### Z SHARES:

| Portfolio | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.00% | Maximum 0.75% |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Social Bond** | **0.30%** | **0.15%** | EUR |
| | **European Strategic Bond** | **0.40%** | **0.15%** | EUR |
| | **Global Corporate Bond** | **0.40%** | **0.15%** | USD |
| | **European Corporate Bond** | **0.40%** | **0.15%** | EUR |
| | **European High Yield Bond** | **0.60%** | **0.15%** | EUR |
| | **European Short-Term High Yield Bond** | **0.40%** | **0.15%** | EUR |
| | **Emerging Market Corporate Bonds** | **0.60%** | **0.15%** | USD |
| | **Emerging Market Debt** | **0.60%** | **0.15%** | USD |
| | **Global Emerging Market Short-Term Bonds** | **0.60%** | **0.15%** | USD |
| | **US High Yield Bond** | **0.45%** | **0.15%** | USD |
| | **Flexible Asian Bond** | **0.40%** | **0.15%** | USD |
| **Asset Allocation Portfolios** | | | | |
| | **Global Dynamic Real Return** | **0.75%** | **0.25%** | USD |
| | **Global Multi Asset Income** | **0.75%** | **0.30%** | USD |
| **Equity Portfolios** | | | | |
| | **Global Focus** | **0.75%** | **0.15%** | USD |
| | **Global Emerging Market Equities** | **0.75%** | **0.15%** | USD |
| | **Sustainable Global Equity Income** | **0.75%** | **0.15%** | USD |
| | **Global Select** | **0.75%** | **0.15%** | USD |
| | **Global Smaller Companies** | **0.75%** | **0.30%** | EUR |
| | **American** | **0.75%** | **0.25%** | USD |
| | **American Smaller Companies** | **0.75%** | **0.30%** | USD |
| | **Asia Equities** | **0.75%** | **0.30%** | USD |
| | **American Select** | **0.75%** | **0.15%** | USD |
| | **US Contrarian Core Equities** | **0.75%** | **0.15%** | USD |
| | **US Disciplined Core Equities** | **0.30%** | **0.15%** | USD |
| | **European Smaller Companies** | **0.75%** | **0.35%** | EUR |
| | **Pan European Equities** | **0.75%** | **0.15%** | EUR |
| | **Pan European Focus** | **0.75%** | **0.15%** | EUR |
| | **Pan European Small Cap Opportunities** | **0.75%** | **0.35%** | EUR |
| | **Pan European Smaller Companies** | **0.75%** | **0.35%** | EUR |
| | **European Select** | **0.75%** | **0.30%** | EUR |
| | **Asian Equity Income** | **0.75%** | **0.30%** | USD |
| | **Global Technology** | **0.85%** | **0.15%** | USD |
| | **UK Equities** | **0.75%** | **0.30%** | GBP |
| | **UK Equity Income** | **0.75%** | **0.30%** | GBP |
| | **Japan Equities** | **0.70%** | **0.15%** | JPY |

| | | | | |
|---|---|---|---|---|
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.30%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.30%** | USD |
| | **Global Real Estate Securities** | **0.75%** | **0.15%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Credit Opportunities** | **0.55%** | **0.15%** | EUR |
| | **Pan European Absolute Alpha** | **0.75%** | **0.30%** | EUR |
| **Specialist Portfolio** | | | | |
| | **Enhanced Commodities** | **0.75%** | **0.15%** | USD |

# APPENDIX O
## PORTFOLIO CHARGES

### CLASS 1 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 5.0% | N/A |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **1.00%** | **0.19%** | EUR |
| | **European High Yield Bond** | **1.20%** | **0.18%** | EUR |
| **Equity Portfolios** | | | | |
| | **American** | **1.50%** | **0.17%** | USD |
| | **American Select** | **1.50%** | **0.17%** | USD |
| | **American Smaller Companies** | **1.50%** | **0.18%** | USD |
| | **Asia Equities** | **1.50%** | **0.20%** | USD |
| | **European Select** | **1.50%** | **0.15%** | EUR |
| | **European Smaller Companies** | **1.50%** | **0.22%** | EUR |
| | **Global Emerging Market Equities** | **1.50%** | **0.21%** | USD |
| | **Sustainable Global Equity Income** | **1.50%** | **0.18%** | USD |
| | **Global Select** | **1.50%** | **0.18%** | USD |
| | **Pan European Equities** | **1.30%** | **0.23%** | EUR |
| | **Pan European Focus** | **1.50%** | **0.20%** | EUR |
| | **Pan European Smaller Companies** | **1.50%** | **0.22%** | EUR |
| | **UK Equity Income** | **1.50%** | **0.14%** | GBP |
| | **UK Equities** | **1.50%** | **0.14%** | GBP |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **1.50%** | **0.19%** | USD |
| | **Global Extended Alpha** | **1.50%** | **0.19%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Credit Opportunities** | **1.00%** | **0.17%** | EUR |

# APPENDIX P
## PORTFOLIO CHARGES

## CLASS 2 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | N/A |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **0.50%** | **0.08%** | EUR |
| | **European High Yield Bond** | **0.75%** | **0.07%** | EUR |
| **Equity Portfolios** | | | | |
| | **American** | **1.00%** | **0.06%** | USD |
| | **American Select** | **1.00%** | **0.06%** | USD |
| | **American Smaller Companies** | **1.00%** | **0.07%** | USD |
| | **Global Select** | **1.00%** | **0.07%** | USD |
| | **Asia Equities** | **1.00%** | **0.09%** | USD |
| | **European Select** | **1.00%** | **0.06%** | EUR |
| | **European Smaller Companies** | **1.00%** | **0.07%** | EUR |
| | **Global Emerging Market Equities** | **1.00%** | **0.10%** | USD |
| | **Sustainable Global Equity Income** | **1.00%** | **0.07%** | USD |
| | **Pan European Equities** | **1.00%** | **0.08%** | EUR |
| | **Pan European Focus** | **1.00%** | **0.09%** | EUR |
| | **Pan European Smaller Companies** | **1.00%** | **0.07%** | EUR |
| | **UK Equity Income** | **1.00%** | **0.07%** | GBP |
| | **UK Equities** | **1.00%** | **0.07%** | GBP |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.08%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.08%** | USD |
| **Absolute Return Portfolios** | | | | |
| | **Credit Opportunities** | **0.50%** | **0.06%** | EUR |

# APPENDIX Q
## PORTFOLIO CHARGES

### CLASS 3 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | Maximum 3.0% | N/A |

Sales charges are maximums, which distributors or sub-distributors are allowed to waive in whole or in part, depending on the size of the subscription or upon local market considerations.

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **0.50%** | **0.19%** | EUR |
| | **European High Yield Bond** | **0.60%** | **0.17%** | EUR |
| **Equity Portfolios** | | | | |
| | **American** | **0.75%** | **0.13%** | USD |
| | **American Select** | **0.75%** | **0.12%** | USD |
| | **American Smaller Companies** | **0.75%** | **0.18%** | USD |
| | **Asia Equities** | **0.75%** | **0.20%** | USD |
| | **European Select** | **0.75%** | **0.13%** | EUR |
| | **European Smaller Companies** | **0.75%** | **0.18%** | EUR |
| | **Global Emerging Market Equities** | **0.75%** | **0.21%** | USD |
| | **Sustainable Global Equity Income** | **0.75%** | **0.18%** | USD |
| | **Global Select** | **0.75%** | **0.15%** | USD |
| | **Pan European Equities** | **0.75%** | **0.19%** | EUR |
| | **Pan European Focus** | **0.75%** | **0.20%** | EUR |
| | **Pan European Smaller Companies** | **0.75%** | **0.16%** | EUR |
| | **UK Equity Income** | **0.75%** | **0.13%** | GBP |
| | **UK Equities** | **0.75%** | **0.12%** | GBP |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.19%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.19%** | USD |

## APPENDIX R
## PORTFOLIO CHARGES

### CLASS 4 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | N/A |

***FOR THE AVOIDANCE OF DOUBT THERE ARE NO ASSET MANAGEMENT FEES FOR CLASS 4 SHARES***

| Portfolio Type | Name of Portfolio | Operating Expenses | Base Currency |
|---|---|---|---|
| **Bond Portfolio** | | | |
| | **European Corporate Bond** | **0.08%** | EUR |
| | **European High Yield Bond** | **0.07%** | EUR |
| **Equity Portfolios** | | | |
| | **American Smaller Companies** | **0.06%** | USD |
| | **Global Select** | **0.07%** | USD |
| | **Pan European Equities** | **0.08%** | EUR |
| | **Pan European Focus** | **0.09%** | EUR |
| | **Pan European Smaller Companies** | **0.07%** | EUR |
| **Absolute Return Portfolio** | | | |
| | **Credit Opportunities** | **0.06%** | EUR |

# APPENDIX S
## PORTFOLIO CHARGES

## CLASS 8 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | N/A |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **0.50%** | **0.12%** | EUR |
| | **European High Yield Bond** | **0.75%** | **0.11%** | EUR |
| **Equity Portfolios** | | | | |
| | **American** | **1.00%** | **0.10%** | USD |
| | **American Select** | **1.00%** | **0.10%** | USD |
| | **American Smaller Companies** | **1.00%** | **0.11%** | USD |
| | **Asia Equities** | **1.00%** | **0.13%** | USD |
| | **European Select** | **1.00%** | **0.10%** | EUR |
| | **European Smaller Companies** | **1.00%** | **0.11%** | EUR |
| | **Global Emerging Market Equities** | **1.00%** | **0.14%** | USD |
| | **Sustainable Global Equity Income** | **1.00%** | **0.11%** | USD |
| | **Global Select** | **1.00%** | **0.11%** | USD |
| | **Pan European Equities** | **1.00%** | **0.12%** | EUR |
| | **Pan European Focus** | **1.00%** | **0.13%** | EUR |
| | **Pan European Smaller Companies** | **1.00%** | **0.11%** | EUR |
| | **UK Equity Income** | **1.00%** | **0.11%** | GBP |
| | **UK Equities** | **1.00%** | **0.11%** | GBP |
| **Extended Alpha Portfolios** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.12%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.12%** | USD |
| **Absolute Return Portfolio** | | | | |
| | **Credit Opportunities** | **0.50%** | **0.10%** | EUR |

## APPENDIX T
## PORTFOLIO CHARGES

### CLASS 9 SHARES:

| Portfolios | Initial Sales Charge as a % of the amount invested | Exchange Fee |
|---|---|---|
| **Each Portfolio listed below** | N/A | N/A |

| Portfolio Type | Name of Portfolio | Asset Management Fee | Operating Expenses | Base Currency |
|---|---|---|---|---|
| **Bond Portfolios** | | | | |
| | **European Corporate Bond** | **0.50%** | **0.10%** | EUR |
| | **European High Yield Bond** | **0.60%** | **0.10%** | EUR |
| **Equity Portfolios** | | | | |
| | **American** | **0.75%** | **0.09%** | USD |
| | **American Select** | **0.75%** | **0.08%** | USD |
| | **American Smaller Companies** | **0.75%** | **0.14%** | USD |
| | **Asia Equities** | **0.75%** | **0.16%** | USD |
| | **European Select** | **0.75%** | **0.09%** | EUR |
| | **European Smaller Companies** | **0.75%** | **0.14%** | EUR |
| | **Global Emerging Market Equities** | **0.75%** | **0.17%** | USD |
| | **Sustainable Global Equity Income** | **0.75%** | **0.14%** | USD |
| | **Global Select** | **0.75%** | **0.10%** | USD |
| | **Pan European Equities** | **0.75%** | **0.10%** | EUR |
| | **Pan European Focus** | **0.75%** | **0.16%** | EUR |
| | **Pan European Smaller Companies** | **0.75%** | **0.12%** | EUR |
| | **UK Equity Income** | **0.75%** | **0.09%** | GBP |
| | **UK Equities** | **0.75%** | **0.08%** | GBP |
| **Extended Alpha Portfolio** | | | | |
| | **American Extended Alpha** | **0.75%** | **0.15%** | USD |
| | **Global Extended Alpha** | **0.75%** | **0.15%** | USD |

# APPENDIX U
## GENERAL SUSTAINABILITY DISCLOSURES

The Management Company and the SICAV are subject to SFDR. In accordance with SFDR, the Management Company is required to disclose information about (i) the environmental or social characteristics of the Article 8 Portfolios that it manages; and (ii) the sustainable objective of the Article 9 Portfolios that it manages. This disclosure information is set out in the Annex to this Appendix U below.

**Categorisation of the Portfolios under SFDR**

The following Portfolios are considered to fall within the scope of Article 8 of SFDR as they each promote environmental and/or social characteristics ("**Article 8 Portfolios**"):

| |
|---|
| 1. CT (Lux) Pan European Equities |
| 2. CT (Lux) Global Focus |
| 3. CT (Lux) Global Select |
| 4. CT (Lux) Global Smaller Companies |
| 5. CT (Lux) American Smaller Companies |
| 6. CT (Lux) Asia Equities |
| 7. CT (Lux) European Smaller Companies |
| 8. CT (Lux) European Select |
| 9. CT (Lux) Pan European Smaller Companies |
| 10. CT (Lux) European High Yield Bond |
| 11. CT (Lux) Global Corporate Bond |
| 12. CT (Lux) European Corporate Bond |
| 13. CT (Lux) Global Emerging Market Equities |
| 14. CT (Lux) American |
| 15. CT (Lux) American Select |
| 16. CT (Lux) US Contrarian Core Equities |
| 17. CT (Lux) Pan European Small Cap Opportunities |
| 18. CT (Lux) UK Equities |
| 19. CT (Lux) Japan Equities |
| 20. CT (Lux) Pan European Focus |
| 21. CT (Lux) European Short-Term High Yield Bond |
| 22. CT (Lux) Emerging Market Corporate Bonds |
| 23. CT (Lux) US Disciplined Core Equities |
| 24. CT (Lux) Global Real Estate Securities |

The following Portfolios are considered to fall within the scope of Article 9 of SFDR as they each have a sustainable investment objective ("**Article 9 Portfolios**"):

| |
|---|
| 1. CT (Lux) European Social Bond |
| 2. CT (Lux) Sustainable Global Equity Income |

Detailed disclosures for the Article 8 and 9 Portfolios are set out in the "Investment Objectives and Policies" section of this Prospectus.

The Portfolios of the SICAV that are not listed above are not considered to fall within the scope of Article 8 or 9 of SFDR as these Portfolios do not promote environmental and/or social characteristics within the meaning of Article 8 of SFDR or sustainable investment objective within the meaning of Article 9 of SFDR. Such funds are considered to fall within scope of Article 6 of SFDR.

**Sustainability Risk Disclosures under SFDR**

Under Article 6 of SFDR, the Management Company, as delegated to the Investment Manager of each Portfolio, is required to disclose the manner in which Sustainability Risks are integrated into its investment decision-making process as well as Portfolio specific disclosures on the likely impacts of Sustainability Risks on the returns of each Portfolio.

Sustainability Risk is defined as "an ESG event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment".

Please see the "Risk Factors" section of this Prospectus for detailed disclosures on the Sustainability Risk Assessment and Sustainability Risk Integration that apply to the Portfolios.

**Disclosures under the EU Taxonomy Regulation**

Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (the "**EU Taxonomy Regulation**") establishes a framework for determining whether an economic activity qualifies as environmentally sustainable across six environmental objectives.

For the Article 8 and 9 Portfolios, information about the EU criteria for environmentally sustainable economic activities as defined in the EU Taxonomy Regulation is available in the Annex to this Appendix below.

The Investment Manager is working to develop its methodology for calculating taxonomy alignment and the position in relation to holding investments that qualify as environmentally sustainable under the EU Taxonomy Regulation will be kept under review. To the extent required, the Annex to this Appendix U will be amended accordingly.

For the remaining Portfolios that are not considered to fall within the scope of Article 8 or 9 of SFDR, the investments underlying these Portfolios do not take into account the EU criteria for environmentally sustainable economic activities under the EU Taxonomy Regulation (0% Taxonomy alignment).

**How the Investment Manager considers adverse sustainability impacts**

Columbia Threadneedle Investments EMEA recognises that investment decisions may contribute to or cause a negative impact on environmental and social sustainability factors ("**adverse sustainability impacts**"). As such, it has opted into the requirement in SFDR to consider the principal adverse impacts (**PAIs**) of its investment decisions on sustainability factors at an entity level. This group level decision became effective on 01 July 2022 and applies to the assets managed by all of the legal entities in EMEA, including the Investment Manager[28].

SFDR introduces a number of mandatory and voluntary PAI indicators that relate to greenhouse gas emissions, biodiversity, water, waste, social and employee matters, respect for human rights and anti-corruption. The Investment Manager intends to address the adverse impacts of its investment decisions on these sustainability indicators in the following ways:

- **Leveraging existing engagement procedures**. Engagement activities can include contacting issuers, holding meetings with issuers and joining initiatives that seek to prevent and mitigate the PAIs. In cases where mitigation fails, potential escalation measures can include voting against management and ultimately divestment where appropriate. The prioritisation of engagement activities is undertaken at a group level.

- **Considering PAIs as part of investment research**. Several PAIs are actively weighted in existing models or included in portfolio monitoring, particularly for sovereign investments.

- **Firm wide exclusions**. The Investment Manager currently has in place a firm wide exclusion for controversial weapons.

This methodology applies at an entity level and reflects the Investment Manager's overall approach to the consideration of PAIs. As such, its application does not lead to individual portfolios being deemed to have opted into the consideration of PAIs at a product level under SFDR. Where the Investment Manager considers PAIs at the level of the investments it makes for a Portfolio, it will separately disclose the specific methodology that it uses in the Portfolio's investment policy as the approach will be different to the one taken at an entity level, as set out above.

More information explaining how the Investment Manager aims to consider the PAIs of its investment decisions at an entity level can be found on its website.

[28] To be read in this section as Threadneedle Asset Management Limited (TAML).

For the avoidance of doubt, Columbia Management Investment Advisers, LLC does not consider the PAIs of its investment decisions on sustainability factors under SFDR at an entity level.

**How the Investment Manager considers adverse sustainability impacts for the Portfolios**

The Investment Manager does not consider the principal adverse impacts of investment decisions on sustainability factors specifically at the level of the investments it makes for any of the Portfolios, except for the Article 8 and 9 Portfolios for which further information may be found in the Annex to this Appendix below.

**Controversial Weapons Policy**

In this policy 'we', 'us' and 'our' means the group of legal entities whose parent company is TAM UK International Holdings Limited (TAMUK) which is part of Columbia Threadneedle Investments, the asset management business of Ameriprise Financial, Inc., and includes the Management Company.

To protect shareholders and broader stakeholders' interests, we have maintained a controversial weapons exclusion policy since 2011. Reflecting both international conventions and the legal requirements in certain jurisdictions, we seek to avoid the Portfolios investing in companies involved in the production, sale or distribution of controversial weapons including landmines, cluster munitions, blinding laser, non-detectable fragment and biochemical weapons and depleted uranium ammunition and armour.

Our definition of production extends to manufacturers of controversial weapon systems, munitions, exclusive delivery platforms and key components. This includes companies that own 50% or more in another firm engaged in such activities. Dual use platforms or components and past involvement in these weapons are not included in scope.

If an investment becomes exposed to excluded activities, it should be divested within a period as determined by the SICAV to be in the best interest of shareholders. Where an issuer is involved in excluded activities, we reserve the right to take short positions in such securities.

**Basis**

Exclusions under the core controversial weapons policy will be applied in line with the following international conventions and national law which prohibit the production, sale, distribution and use of the following weapons:

| Weapon | Basis | Effective |
|---|---|---|
| • Biological | UN Biological Weapons Convention | 1975 |
| • Blinding Lasers | UN Convention on Certain Conventional Weapons, Protocol IV | 1998 |
| • Chemical | UN Chemical Weapons Convention | 1997 |
| • Cluster Munitions | UN Convention on Cluster Munitions | 2010 |
| • Depleted Uranium (incl. armour) | Belgian Law on Weapons (Loi sur les Armes) | 2009 |
| • Land Mines | UN Anti-Personnel Landmines Convention | 1999 |
| • Non-Detectable Fragments | UN Convention on Certain Conventional Weapons, Protocol I | 1983 |

Additional exclusions for white phosphorus and nuclear weapons are integrated into our general exclusions framework for developing fund strategies, for example, those funds which promote environmental and/or social characteristics or have a sustainable investment objective. These exclusions refer to the following international conventions:

| Weapon | Basis | Effective |
|---|---|---|
| • White Phosphorus | UN Convention on Certain Conventional Weapons, Protocol III | 1983 |
| • Nuclear | UN Treaty on the Non-Proliferation of Nuclear Weapons | 1970 |
| | UN Treaty on the Prohibition of Nuclear Weapons | 2021 |

It was recognised that white phosphorous may be deemed controversial only in specific applications and its use is regulated without total prohibition. Where we seek to avoid investment in nuclear weapons, we respect the principle of disarmament underpinning the Non-Proliferation Treaty, and more stringent requirements under the Treaty on the Prohibition of Nuclear Weapons.

**Implementation**

In implementing our policy, we engage a third-party research provider to help identify companies involved in the production, sale or distribution of controversial weapons. No such issuers are currently identified in relation to

blinding laser, non-detectable fragment or white phosphorus weapons. The exclusion of identified securities follows a defined process incorporating Compliance, Research and Responsible Investment, increasing collaboration and research intensity. Our procedures and exclusion list are reviewed and updated on an annual basis.

**Net Zero Asset Managers Initiative**

Columbia Threadneedle Investments is a signatory to the **Net Zero Asset Managers Initiative** (NZAMI), which commits us to an ambition in partnership with clients, to reach net zero emissions by 2050 or sooner across all assets under management. This commitment is in line with UK and EU governments' own net zero targets. It also builds on regulation requiring asset managers to identify and manage the financial risk caused by climate change that negatively impacts the value of companies that they invest in.

NZAMI is an international group of asset managers committed to supporting the goal of net zero, and as part of the NZAMI commitment, assets being managed for net zero alignment must fulfil a number of key elements. These include (i) an interim target for 2030 that is consistent with a fair share of the 50% global reduction in CO2, alongside the prioritisation of real economy impacts; (ii) the facilitation of investment in climate solutions; (iii) a commitment to active engagement; and (iv) transparency in reporting. Full details of the commitment made by NZAMI signatories can be found here: Commitment – The Net Zero Asset Managers initiative.

Columbia Threadneedle Investments uses the Net Zero Investment Framework methodology, which covers equities and corporate bonds, to assess the alignment of funds. The initial focus has been on funds located in Europe. The framework will be extended to other asset classes over time. The following Portfolios are managed in line with the methodology:

- CT (Lux) American
- CT (Lux) American Select
- CT (Lux) Asia Equities
- CT (Lux) European Corporate Bond
- CT (Lux) European High Yield Bond
- CT (Lux) European Select
- CT (Lux) European Smaller Companies
- CT (Lux) European Social Bond
- CT (Lux) Global Corporate Bond
- CT (Lux) Sustainable Global Equity Income
- CT (Lux) Global Focus
- CT (Lux) Global Select
- CT (Lux) Pan European Equities
- CT (Lux) Pan European Small Cap Opportunities
- CT (Lux) Pan European Smaller Companies
- CT (Lux) UK Equities
- CT (Lux) Global Smaller Companies

Stewardship lies at the heart of our approach to net zero and we actively engage with companies within our funds to influence change and help to achieve improved net zero alignment status. We also conduct both company and portfolio level alignment analysis to assist with our investment decision making process. Our aim is for each fund to hold at least 70% of its portfolio emissions in net zero aligned or engaged companies. Further detail on the methodology we use can be found on our website www.columbiathreadneedle.com.

Our NZAMI commitment and implementation of the associated methodology may have the following impacts on funds and these impacts are disclosed in the investment policy of each Portfolio in-scope:

(i) An immediate coal divestment policy, covering companies that derive over 30% of their revenue from coal or that develop new coal mines/power;

(ii) Divestment of the highest-emitting companies, if these have been subject to a prolonged period of engagement and still fail to meet minimum standards and expectations. These companies are defined in a Focus List, comprising those included in the Climate Action 100+ initiative (CA100+), plus top 20 contributors to Columbia Threadneedle Investment's financed emissions (which overlaps with CA100+).

To the extent that Columbia Threadneedle Investment's commitment to net zero requires any further changes to the investment objectives, policies or strategies of any of our funds, or where we anticipate that this commitment will otherwise require going forward material changes to the way in which assets are selected for investment for any fund, we will further update the fund documentation accordingly and provide investors with the relevant notification.

**Risk Factor**

There is however no guarantee that Columbia Threadneedle Investments will achieve this commitment, for reasons including (but not limited to) the following:

- there is a risk that companies in which the Portfolio is invested will not operate as expected with respect to the transition to a net zero economy and the reduction of greenhouse gas (GHG) emissions. A company's carbon-reduction performance or practices or the Investment Manager's assessment thereof could vary over time, which could cause the Portfolio to be temporarily invested in companies that do not comply with its net zero carbon economy criteria.

- there may be material differences in interpretation of an investee company's stated pathway to reduce and/or offset its GHG emissions. While the Investment Manager believes its evaluation of its investee companies, or proposed investee companies, is in line with market standards, the decisions the Investment Manager makes may differ with other professional views regarding carbon reduction characteristics.

- the Investment Manager may rely on information and data related to carbon intensity and carbon emissions provided by a third-party firm, which could be incomplete or erroneous, which in turn could cause the Investment Manager to assess a company's net zero carbon characteristics incorrectly. Third-party data providers may differ in the data they provide for a given security or between industries, or may only take into account one of many carbon-related components of a company.

- data availability and reporting with respect to net zero carbon criteria and how companies meet them may not always be available or may become unreliable.

- regulatory changes or interpretations regarding the definitions and/or use of net zero carbon characteristics could have a material adverse effect on the Portfolio's net zero commitment or its ability to invest in line with the current investment objective or strategy of the Portfolio.

- our current strategy of engaging with companies as a way to encourage improvements in carbon emissions may be insufficient to achieve net zero. It is likely that over time changes to the assets of the Portfolio will be required and the timing of any such changes, or of the successful outcomes of our engagements, may have an impact on the Portfolio achieving net zero in the desired timescales.

- understanding of the net zero transition is, on a global level, continuing to evolve. It is unlikely that the Portfolio's trajectory towards net zero will follow a linear path and as global understanding of the full implications of a net zero economy evolve and develop, the pathway towards achieving net zero as part of a just transition may change.

In order to mitigate the risks involved as a result of the lack of data and evolving standards, the Investment Manager will provide periodic updates to investors on the Portfolio's progress towards fulfilling the NZAMI commitment.

Investors should understand that this is a continuing ambition of the Portfolio, but not an outcome which is guaranteed nor is any guarantee given that progress towards this ambition for the Portfolio will necessarily result in better returns for investors. A Portfolio's progress towards this ambition may impact the performance of the Portfolio positively or negatively.

# ANNEXES SFDR RTS

## CT (LUX) PAN EUROPEAN EQUITIES

**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**

**Product name:** CT (Lux) Pan European Equities (the "**Portfolio**")

**Legal entity identifier:** 5493003HOJGB5U7D3492

## Environmental and/or social characteristics

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

| ☐ **Yes** | ☒ **No** |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Europe Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:
  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

- The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, to measure the environmental and social characteristics explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Europe Index assessed over rolling 12-month periods, using the ESG Materiality Rating model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality rating. All companies with strong ESG Materiality ratings (rating 1-3) are considered aligned with the environmental and social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:
  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and
  - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

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, anti-corruption and anti-bribery matters.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact), (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.
This model identifies harm by using a quantitative threshold against a selection of PAI indicators.

Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Managers considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | **Exclusions** | **Stewardship[29]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |

[29] PAIs are considered as part of engagement prioritisation.

| | | |
|---|---|---|
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[30] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[31] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio is actively managed in reference to the MSCI Europe Index, and invests principally in the shares of large companies domiciled in Europe or with significant European activities.

The Portfolio aims to compare favourably with the MSCI Europe Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "**Model**").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

While the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Europe Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and

[30] Exclusion relates to coal investments only.
[31] Exclusion relates to coal investments only.

activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Europe Index over rolling 12-month periods.

The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**
The Investment Manager ensures that at least 90% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own fundamental research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion

of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure minimum environmental or social safeguards

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

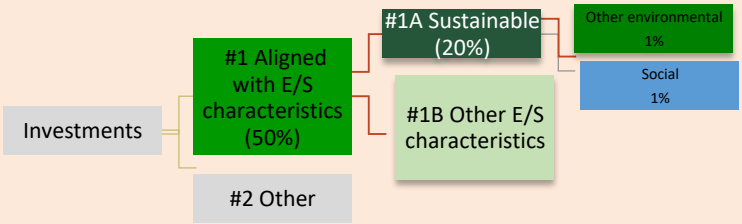
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes.

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[32]?***

☐ Yes:

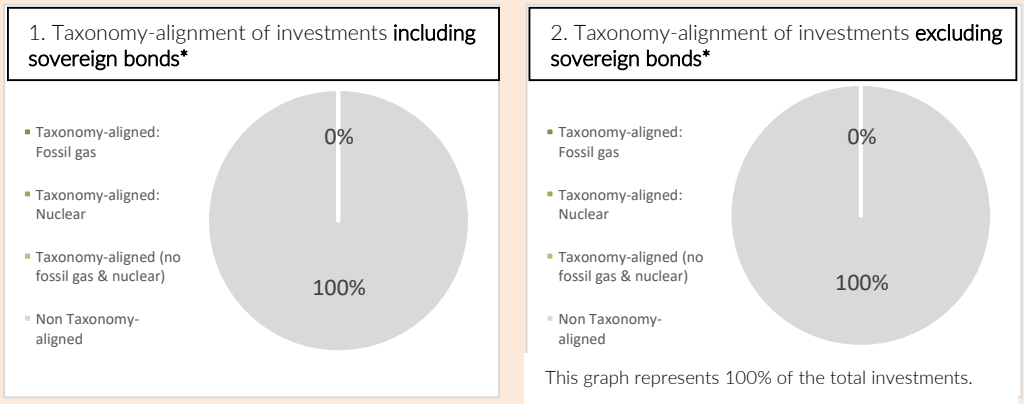
☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

**Enabling activities** directly enable other activities to make a substantial contribution to 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.




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with

[32] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**
The Portfolio does not use the MSCI Europe Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) Global Focus

**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.

**Product name:** CT (Lux) Global Focus (the "**Portfolio**")

**Legal entity identifier:** 549300N6B2IZVI8Z4Q40

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Goverance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI ACWI Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with ESG ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities,in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

    - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

    - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI ACWI Index assessed over rolling 12-month periods, using the ESG Materiality Rating model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

- that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

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, anti-corruption and anti-bribery matters.

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that

no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and Investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of principal adverse indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | **Exclusions** | **Stewardship[33]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |

[33] PAIs are considered as part of engagement prioritisation.

| | | |
|---|---|---|
| 1.4. Exposure to companies active in the fossil fuel sector[34] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[35] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital growth through investment in a concentrated portfolio of equity securities. These may be equity securities of companies conducting their business in developed or emerging market countries. The Portfolio is actively managed in reference to the MSCI ACWI Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the MSCI ACWI Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI ACWI Index, on a rolling 12-month basis.

[34] Exclusion relates to coal investments only.
[35] Exclusion relates to coal investments only.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI ACWI Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

Asset allocation describes the share of investments in specific assets.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

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 Investment Manager ensures that at least 90% of the total net assets of the Portfolio, excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own fundamental research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**
Other investments may include

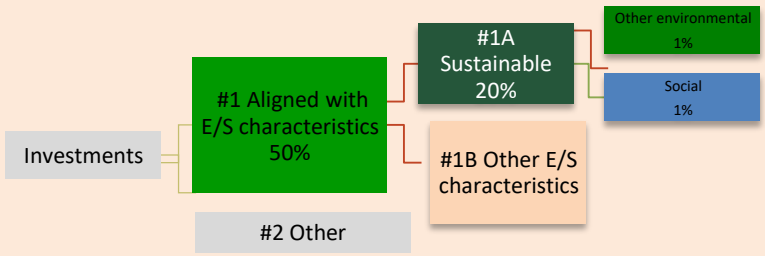
(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.




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.

**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that***

***comply with the EU Taxonomy[36]?***

☐ Yes:

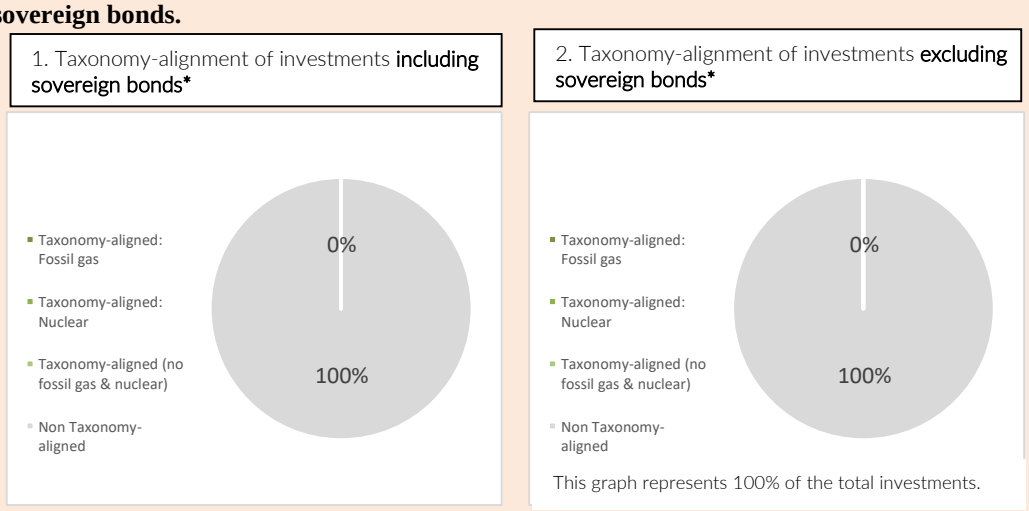
☐ In fossil gas ☐ In nuclear energy

☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What investments are included under "#2 Other", what is their purpose and are there any**

[36] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**minimum environmental or social safeguards?**

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI ACWI Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) SUSTAINABLE GLOBAL EQUITY INCOME

**Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852**

**Product name:** CT (Lux) Sustainable Global Equity Income

**Legal entity identifier:** 549300WX6ZDL2WOHJS77

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

**Does this financial product have a sustainable investment objective?**

| ●● ☒ **Yes** | ●● ☐ **No** |
|---|---|
| ☒ It will make a minimum of **sustainable investments with an environmental objective:** 10% | ☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___ % of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☐ with a social objective |
| ☒ It will make a minimum of **sustainable investments with a social objective:** 10% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

**What is the sustainable investment objective of this financial product?**

The Portfolio seeks to address the sustainability challenges facing people and the environment by investing in companies that provide solutions aligned with the Portfolio's Sustainability Themes: Energy Transition, Resource Efficiency, Sustainable Infrastructure, Sustainable Finance, Societal Development, Health & Wellbeing, Technological Inclusion & Innovation ("Sustainability Themes").

The Portfolio expects to invest at least 80% of its total assets in shares of companies whose products or services provide solutions to environmental or social challenges in line with the Portfolio's Sustainability Themes. Such investments qualify as sustainable investments within the meaning of Article 2(17) of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 ("SFDR")37.

The Investment Manager avoids investments that conflict with the sustainable investment objective of the Portfolio, in line with the exclusion policy set out below and invests in companies that provide sustainable solutions in alignment with the Portfolio's Sustainability Themes. The Investment Manager also engages to support greater insight into companies and their alignment to the Portfolio's sustainable investment objective, and to encourage better management of ESG topics by companies and support them in considering – and where relevant, mitigating – the impact of their operations on environmental and social factors.

The remaining portion of the Portfolio consists of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.

The Investment Manager does not use a reference benchmark in respect of the sustainable investment objective applied to the Portfolio.

***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

The Investment Manager uses the following indicators to measure the attainment of the sustainable investment objective of the Portfolio:

- The Portfolio's compliance with the exclusion criteria and/or global norms.
- Investee companies' revenue alignment with the targets which underpin the United Nations Sustainable Development Goals (SDGs)[38].
- The percentage of the Portfolio's investments aligned with its Sustainability Themes.

***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

The Portfolio's investment philosophy, as explained in more detail below in the description of the investment strategy followed by the Portfolio, ensures that the sustainable investments made by the Portfolio do not significantly harm the sustainable investment objective.

In addition, the Portfolio excludes investments that are contrary to the Portfolio's goals of making a positive contribution to the environment and/or society, as explained below under the "Avoid" section of the description of the investment strategy followed by the Portfolio. These criteria are product- and conduct-based, avoiding investment in companies with, for example, significant exposure (based on revenues) to certain activities that conflict with the sustainable investment objective and excluding companies that breach accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights. Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

Furthermore, companies are identified which the Investment Manager thinks could benefit from

engagement to encourage better management of ESG topics.

Principal adverse impacts are also considered as part of the do not significant harm test (as described below in the relevant section) and the Investment Manager will further disclose the principal adverse sustainability indicators as part of its periodic reporting.

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

The model identifies harm by using a quantitative threshold against a selection of principal adverse impact indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has occurred or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams endeavour to satisfy that no significant harm has taken place by deploying their best efforts to obtain the information by carrying out additional research or making reasonable assumptions through desk-based research or engagement with the management team of the company.

In addition, all holdings must comply with a set of environmental and social exclusions which seek to avoid harming sustainability factors as detailed below.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies with breaches of the UN Global Compact's (UNGC) Principles and/or the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The Portfolio further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

[37] The minimum proportion of sustainable investments held by the Portfolio is 80% to cover the fact that ancillary liquid assets may be held by the Portfolio under unfavourable market conditions, as described below in the asset allocation section.
[38] An internationally developed framework of 17 goals and 169 underlying targets that set out a roadmap to a more sustainable world by 2030.

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

☒ Yes

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, anti-corruption and anti-bribery matters.

The Investment Manager proactively considers the principal adverse impacts ("PAIs") of the investment decisions it makes for the Portfolio that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators, and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, non-renewable energy production, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of principal adverse indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?*".

| | **Exclusions** | **Stewardship**[39] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.8. Emissions to water | | ✓ |
| 1.9. Hazardous waste and radioactive waste ratio | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises | | ✓ |
| 1.12. Unadjusted gender pay gap | | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |

[39] Where certain harmful practices are identified, and engagement is unsuccessful, this may, in certain instances, lead to divestment.

| | | |
|---|---|---|
| 2.15. Deforestation | | ✓ |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio is actively managed and seeks to achieve a total return from income and capital appreciation by investing in companies that provide solutions aligned with the Portfolio's Sustainability Themes.

The investment strategy embeds an "Avoid, Invest, Improve" philosophy:

**Avoid** – The Investment Manager has a set of exclusion criteria setting threshold standards to avoid investment in companies that conflict with the sustainable investment objective of the Porfolio (i.e. with socially or environmentally damaging products or unsustainable business or governance practices).

**Invest** – The Portfolio seeks investment opportunities across companies providing sustainability solutions to environmental or social challenges, aligned to one or more of the Portfolio's Sustainability Themes (as outlined below).

The Investment Manager assesses how material the contribution of an investment to the Sustainability Themes is, by reference to a company's revenues. In most cases this is determined using the UN SDG framework which aligns with the Portfolio's Sustainability Themes. The Investment Manager maps companies' individual revenue streams to the underlying 'Targets' of the SDG framework, as either positive, negative or neutral. A company must generate 50% or more of its total net revenue from products or services providing solutions aligned to the Sustainability Themes (net means we subtract any revenues that are negatively aligned to the Sustainability Themes from revenues that are positively aligned) to ensure that the sustainable segments of the company's business are the largest part.

1. Energy Transition – Climate change poses escalating risks to economies and communities worldwide, driven by continued reliance on fossil fuels and resulting in environmental, social and economic disruptions.

2. Resource Efficiency – Unsustainable consumption and inefficient use of natural resources are depleting ecosystems, causing environmental degradation, and threatening long-term economic stability.

3. Sustainable Infrastructure – Rapid urbanisation and increasing exposure to climate-related hazards are leaving infrastructure vulnerable, amplifying risks to human safety, economic activity, and environmental sustainability.

4. Sustainable Finance – Current financial systems often fail to adequately support projects delivering social and environmental benefits, or underserved communities, slowing progress towards sustainable development goals.

5. Societal Development – Growing inequality and a mismatch between existing education systems and the skills needed for the future workforce are creating barriers to inclusive growth and social mobility.

6. Health & Wellbeing – Increasing health disparities, rising prevalence of chronic diseases, and vulnerability to global health crises threaten societal resilience.

7. Technological Inclusion & Innovation – Diverse environmental and social challenges exist today which can be effectively addressed through the application of data and technological solutions.

Companies' alignment with these seven Sustainability Themes is assessed pre-investment.

The Portfolio will hold a minimum proportion (80%) of sustainable investments in companies that provide sustainability solutions in line with the Portfolio's Sustainability Themes.

**Improve** – The Investment Manager engages to support greater insight into companies and their alignment to the Portfolio's sustainable investment objective, and to encourage better management of ESG topics by companies and support them in considering – and where relevant, mitigating – the impact of their operations on environmental and social factors.

We also have a Responsible Investment (RI) engagement programme, which is executed through close

collaboration of our governance and proxy analysts, sustainability research analysts, fundamental research analysts and portfolio managers. Our RI engagement programme is structured around six high-level themes:

· Environmental Stewardship
· Climate Change
· Human Rights
· Labour Standards
· Business Ethics
· Corporate Governance

We identify and prioritise companies for engagement based on a variety of factors, this includes client preferences, holdings, analysts' coverage, material risks and opportunities, potential systemic risks, unscheduled controversies, or regulatory requirements.

The Investment Manager believes that an appropriate comparator benchmark for
reviewing Portfolio performance is the MSCI ACWI Index, given the investment policy of the Portfolio and the approach taken by the Investment Manager. The Portfolio is not, however, constrained by this benchmark and is free to invest in a portfolio that is materially different to the benchmark's own composition.

The Investment Manager will apply the non-financial criteria described above to at least 80% of the total net assets of the Portfolio.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The following binding elements of the investment strategy are used to meet the sustainable investment objective of the Portfolio:

**Sustainable investment criteria**

**1. Asset selection based on company revenue**

The Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the Portfolio's Sustainability Themes which are aligned to the 17 UN Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's total net revenues are at least 50% positively aligned (after deducting any revenues that are negatively aligned), this indicates it generates the majority of its revenue from sustainable solutions.
- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.
- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

**2. Exclusions: revenue thresholds**

The Portfolio does not invest in companies with, for example, significant exposure (based on revenues) to certain activities that conflict with the sustainable investment objective. These exclusion criteria may be updated from time to time.

Furthermore, the Portfolio complies with the Paris-aligned Benchmark exclusions contained in Article 12 (1) (a)-(g) of Commission Delegated Regulation (EU) 2020/1818).

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles such as: the United Nations Global Compact; the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; the International Labour Organization Labour Standards; and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Net negative alignment with Sustainability Themes**

The Portfolio will not invest in companies with total net revenues that are less than 0% aligned with the Sustainability Themes as this indicates that most of the business is focused on activities that may conflict with the Sustainability Themes.

**5. Net Zero engagement**

The Investment Manager has committed to an ambition to reach net zero emissions by 2050 or sooner for the Portfolio. Accordingly, the Investment Mananger will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

**Asset allocation** describes the share of investments in specific assets.

**What is the asset allocation and the minimum share of sustainable investments?**

**Concerning the planned proportion of investments used to meet the sustainable investment objective of the the Sub-Fund (#1 Sustainable ):**

The Portfolio invests at least 80% of its total net assets in sustainable investments which for the Portfolio are considered to be the equity securities of companies located anywhere in the world, subject to the Portfolio's sustainable investment criteria.

The minimum proportion of sustainable investments held by the Portfolio is 80% to cover the fact that ancillary liquid assets may be held by the Portfolio under unfavourable market conditions, as described below. In practice, all investments included in the Portfolio will be sustainable investments with the exception of (i) ancillary liquid assets (i.e., bank deposits at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

Investments which do not meet the sustainable investment criteria set out above are not included in the Portfolio's proportion of sustainable investments. To calculate the Portfolio's overall proportion of sustainable investments, each investment that meets the above criteria is included in the calculation of sustainable investments (without adjusting, for example, for the percentage of revenue that contributes to SDGs) held in the Portfolio. It being noted, however, that the percentage of revenue that is not linked to the SDGs will also need to meet the "do no significant harm test" in order for the entire investment to be considered a sustainable investment. The entire position of these investments is included in the calculation and added together to determine the total proportion of sustainable investments within the Portfolio.

The Portfolio's minimum allocation to sustainable investments with either an environmental or social objective is 10% and 10%, respectively. However, the actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those sustainable investments which are available, offering the most potential upside from a sustainability and financial returns perspective.

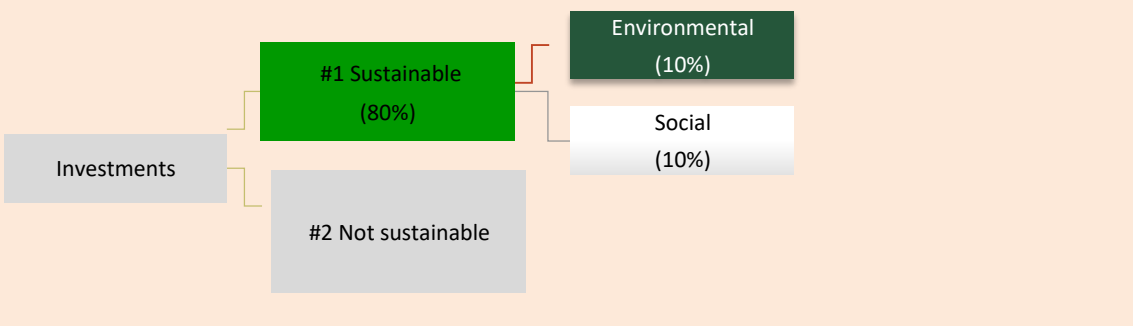
**Concerning the other investments which are not sustainable investments category (#2 Not sustainable):**

Other investments which are not sustainable investments within the meaning of Article 2(17) are: (i) ancillary liquid assets (i.e., bank deposits at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

These other investments are not used to meet the sustainable investment objective of the Portfolio. However, the Portfolio will apply minimum environmental or social safeguards to ensure that such investments which are not sustainable investments will not affect the delivery of the Portfolio's overarching sustainable investment objective on a continuous basis (see details below).

The maximum proportion of investments that may be held by the Portfolio in this category is 20% to take into account ancillary liquid assets that may be held under unfavourable market conditions.

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.



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 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.

**#1 Sustainable** covers sustainable investments with environmental or social objectives.

#**2 Not sustainable** includes investments which do not qualify as sustainable investments.

- ***How does the use of derivatives attain the sustainable investment objective?***

The Portfolio does not use derivatives for the purposes of attaining the sustainable investment objective

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

The Portfolio does not commit to holding a minimum proportion in sustainable investments with an environmental objective aligned with the EU Taxonomy.

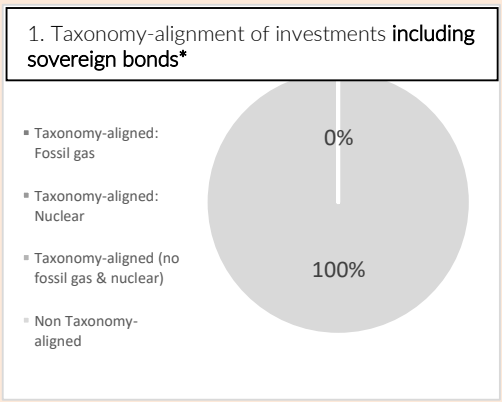
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[40]?***

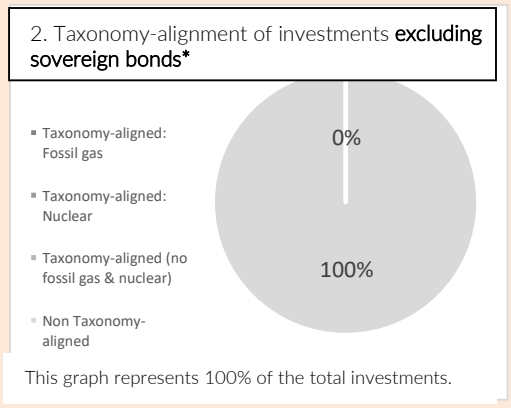
☐ Yes:

- ☐ In fossil gas
- ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

**What is the minimum share of sustainable investments with an environmental objective that are**

[40] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

**not aligned with the EU Taxonomy?**

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 10%. The actual percentage may be higher as it may vary depending on investment opportunities and the proportion of sustainable investments with a social objective. The Portfolio will hold a minimum proportion of 80% of sustainable investments with an environmental or social objective as described above.

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

The minimum share of sustainable investments with a social objective is 10%. The actual percentage may be higher as it may vary depending on investment opportunities and the proportion of sustainable investments with an environnmental objective. The Portfolio will hold a minimum proportion of 80% of sustainable investments with an environmental or social objective as described above.

**What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?**

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), and may also hold bank deposits, money market instruments or money market funds for treasury purposes.

Minimum environmental or social safeguards are applied to ancillary liquid assets, bank deposits and derivatives used for hedging purposes, through the integration of ESG considerations into the Investment Manager's counterparty risk assessment.

**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

Not applicable.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (LUX) GLOBAL SELECT

**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.

**Product name:** CT (Lux) Global Select (the "**Portfolio**")

**Legal entity identifier:** 5493004VNS7Y85HXLI13

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI ACWI Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the Columbia Threadneedle ESG Materiality Rating model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.
- The Investment Manager excludes companies that:
    - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
    - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.
- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI ACWI Index assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.
- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.
- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:
  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
  - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

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, anti-corruption and anti-bribery matters.

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the fund relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[41] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[42] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[43] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital growth through investment in equity securities issued by companies globally. The Portfolio is actively managed in reference to the MSCI ACWI Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The 'select' investment approach means that the Portfolio has the flexibility to take significant stock and sector positions.

The Portfolio aims to compare favourably with the MSCI ACWI Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry.

[41] PAIs are considered as part of engagement prioritisation.
[42] Exclusion relates to coal investments only.
[43] Exclusion relates to coal investments only.

A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI ACWI Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.
To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI ACWI Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 90% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.
The minimum proportion of investments held in the Portfolio used to promote the environmental or

social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

While the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

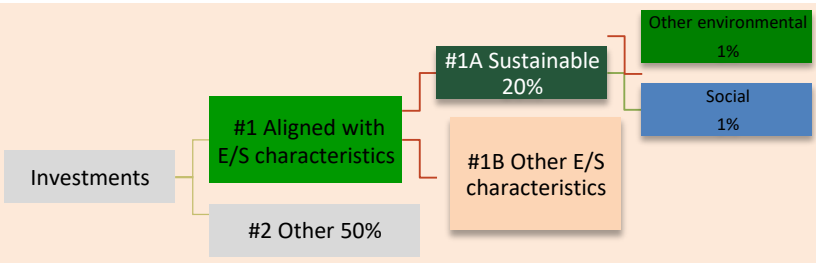
(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.

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.




**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[44]?***

☐ Yes:

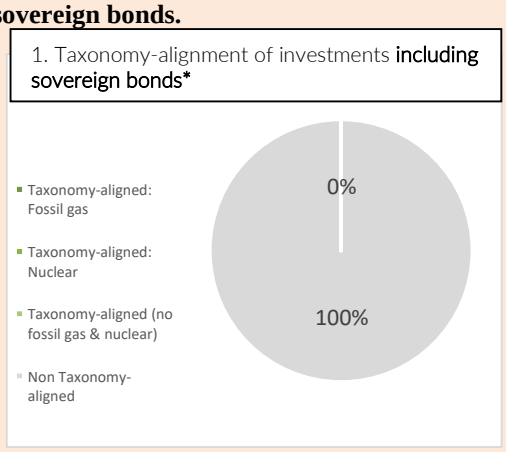
☐ In fossil gas ☐ In nuclear energy

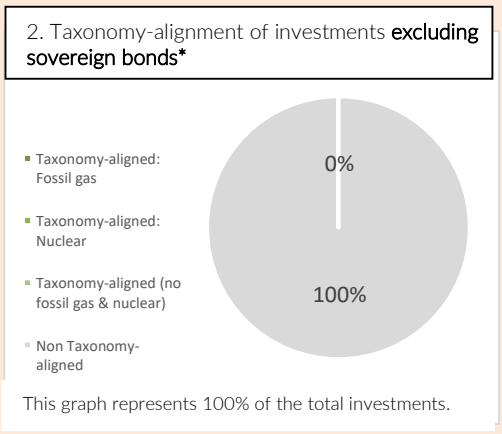
☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

Enabling activities directly enable other activities to make a substantial contribution to 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.




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

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

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

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum

[44] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating or that are not assessed by the Columbia Threadneedle ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments may include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

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

**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?**

The Portfolio does not use the MSCI ACWI Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) GLOBAL SMALLER COMPANIES

**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**

**Product name:** CT (Lux) Global Smaller Companies (the "**Portfolio**")

**Legal entity identifier:** 549300U3LV1YG52NP397

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___% | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI World Small Cap Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with ESG ratings, as assessed by the ESG Materiality Rating model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:
  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have a poorer ESG Materiality Rating to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI World Small Cap Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.
- The Investment Manager excludes companies that:
    - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
    - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

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, anti-corruption and anti-bribery matters.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and

investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[45] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[46] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[47] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital growth through investment in equity securities issued by smaller companies globally. The Portfolio is actively managed in reference to the MSCI World Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio will invest principally in companies that are no larger by market capitalisation that the largest constituent of the MSCI World Small Cap Index.

The Portfolio aims to compare favourably with the MSCI World Small Cap Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings

[45] PAIs are considered as part of engagement prioritisation.
[46] Exclusion relates to coal investments only.
[47] Exclusion relates to coal investments only.

indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI World Small Cap Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI World Small Cap Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. The exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 75% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality

Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

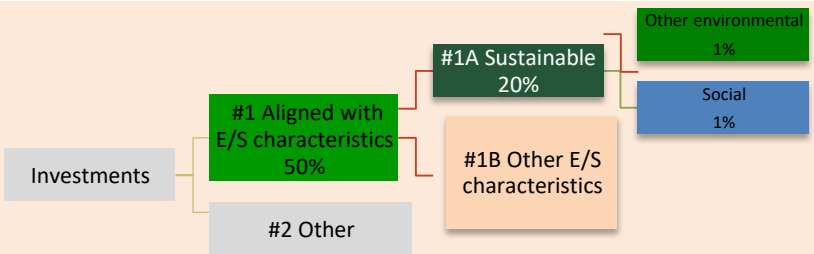
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

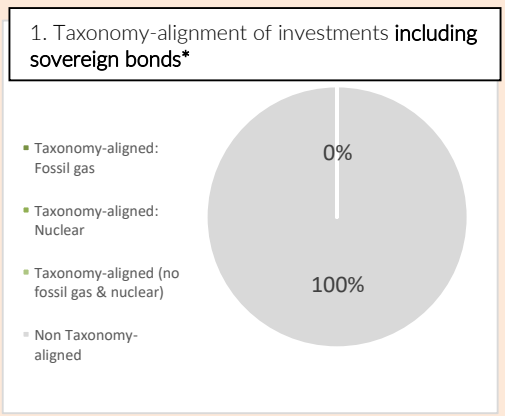
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[48]?***

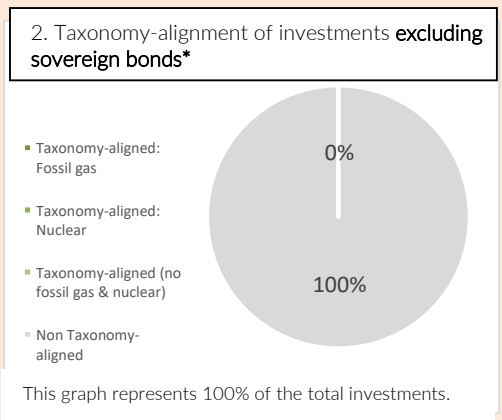
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




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

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

Not applicable.

**What is the minimum share of sustainable investments with an environmental objective that**

[48] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

**are not aligned with the EU Taxonomy?**

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong supportive ESG Materiality rating (rating 4 or 5) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI World Small Cap Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) American Smaller Companies

**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**

**Product name:** CT (Lux) American Smaller Companies (the "**Portfolio**")

**Legal entity identifier:** 549300FL849SFZ3EMB26

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the Russell 2500 Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (10%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the Russell 2500 Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 10% of the Portfolio's assets in sustainable investments.

- The Investment Manager will exclude companies:
  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
  - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

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, anti-corruption and anti-bribery matters.

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[49] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[50] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[51] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of American smaller companies. American smaller companies are companies with a market capitalisation typically ranging from $500 million to $10 billion at the time of purchase. The Portfolio is actively managed in reference to the Russell 2500 Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the Russell 2500 Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.
Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality

[49] PAIs are considered as part of engagement prioritisation.
[50] Exclusion relates to coal investments only.
[51] Exclusion relates to coal investments only.

ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the Russell 2500 Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the Russell 2500 Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. The exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 10% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

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

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 75% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 10% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

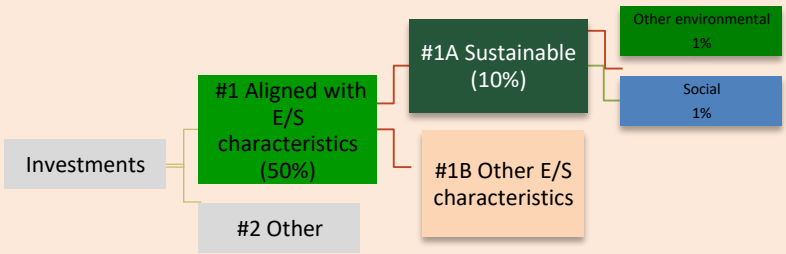
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

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

The Portfolio does not use derivative for the purposes of attaining environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

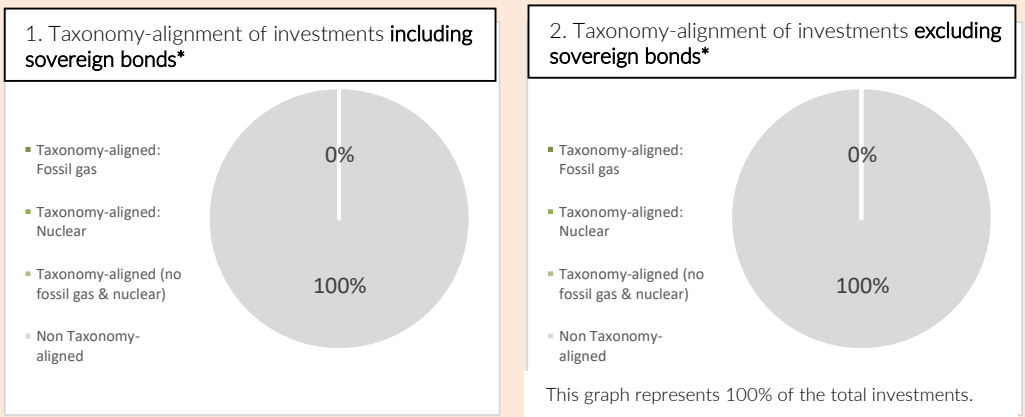
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[52]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




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

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

[52] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the Russell 2500 Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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.

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

**Where can I find more product specific information online?**

More product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) Asia Equities

**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**

**Product name:** CT (Lux) Asia Equities (the "**Portfolio**")

**Legal entity identifier:** 549300NJZIZV56FVQ648

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI AC Asia Pacific ex Japan Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio promotes environmental and social characteristics but does not commit to holding sustainable investments.

The Portfolio also holds a minimum proportion (10%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains positive ESG Materiality rating compared to the MSCI AC Asia Pacific ex Japan Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 10% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:
  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
  - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

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, anti-corruption and anti-bribery matters.

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

  *How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered

taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[53] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[54] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[55] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of companies domiciled in Asia (excluding Japan), or with significant operations in Asia (excluding Japan), including through depositary receipts. The Portfolio is actively managed in reference to the MSCI AC Asia Pacific ex Japan Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the MSCI AC Asia Pacific ex Japan Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held

[53] PAIs are considered as part of engagement prioritisation.
[54] Exclusion relates to coal investments only.
[55] Exclusion relates to coal investments only.

or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI AC Asia Pacific ex Japan Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI AC Asia Pacific ex Japan Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles, as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 10% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets,

including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**
The Investment Manager ensures that at least 90% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies

that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 10% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

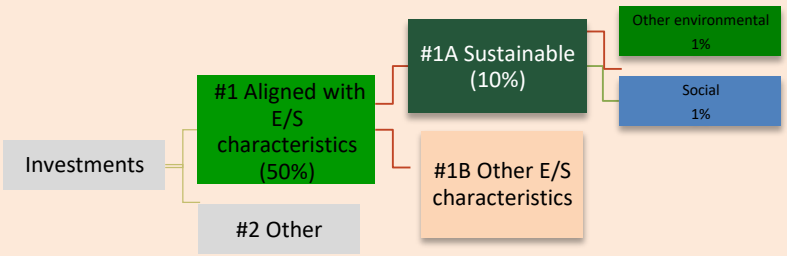
(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

**Concerning the other investments (#2 Other):**
Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and
(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5) or that are not covered by the ESG Materiality Rating Model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

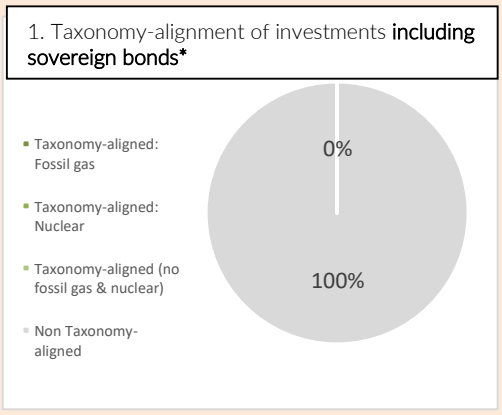
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[56]?***

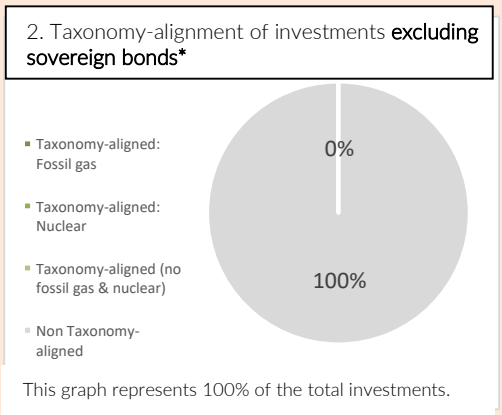
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




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

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

[56] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI AC Asia Pacific ex Japan Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

Not applicable.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) European Smaller Companies

**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**

**Product name:** CT (Lux) European Smaller Companies (the "Portfolio")

**Legal entity identifier:** 54930003VV6JZQNNIC16

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Europe ex UK Small Cap Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Europe ex UK Small Cap Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager excludes companies:

- that it determines are in breach of accepted international standards, for example the UN Global Compact Principals.
- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.
- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.
- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that

no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

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, anti-corruption and anti-bribery matters.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | **Exclusions** | **Stewardship**[57] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[58] | ✓ | ✓ |

[57] PAIs are considered as part of engagement prioritisation.
[58] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.5. Share of non-renewable energy consumption and production[59] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of European smaller companies (excluding the United Kingdom). The Portfolio is actively managed in reference to the MSCI Europe ex UK Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

European smaller companies are companies that, at the time of purchase, are no larger by free-float adjusted market capitalisation[60] than the largest constituent of the MSCI Europe ex UK Small Cap Index.

The Portfolio aims to compare favourably with the MSCI Europe ex UK Small Cap Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Europe ex UK Small Cap Index, on a rolling 12-month basis.

[59] Exclusion relates to coal investments only.
[60] Market capitalisation refers to the total value of a company's shares. The free-float adjusted method of calculating market capitalisation includes only shares available for purchase in public equity markets so excludes, for example, shares held privately, by the company itself and its affiliates or by governments.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

• The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Europe ex UK Small Cap Index over rolling 12-month periods.

• The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. The exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

Asset allocation describes the share of investments in specific assets.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 75% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category

#1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

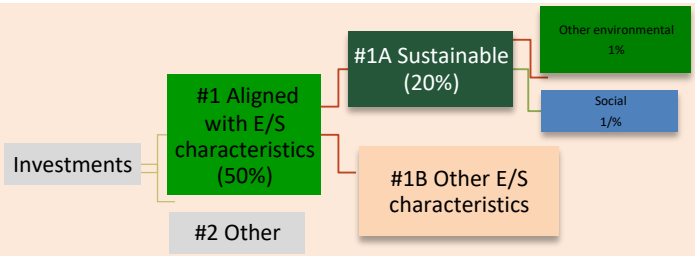
(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.

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.




**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that***

***comply with the EU Taxonomy[61]?***

☐ Yes:

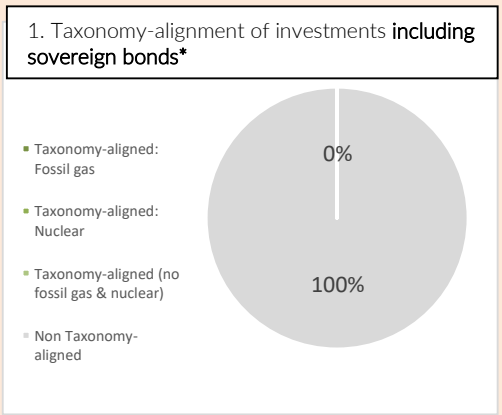
☐ In fossil gas ☐ In nuclear energy

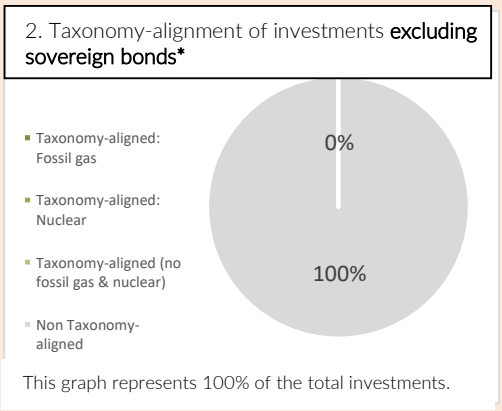
☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

Enabling activities directly enable other activities to make a substantial contribution to 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.




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What investments are included under "#2 Other", what is their purpose and are there any**

[61] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**minimum environmental or social safeguards?**

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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.

The Portfolio does not use the MSCI Emerging Markets Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) European Select

**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**

**Product name:** CT (Lux) European Select (the "**Portfolio**")

**Legal entity identifier:** 549300MKHX2X26Q8CM51

## Environmental and/or social characteristics

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

| ☐ **Yes** | ☒ **No** |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___ % | ☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the FTSE World Europe ex UK Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.
- The Investment Manager excludes companies that:
    - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
    - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.
- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the FTSE World Europe ex UK Index assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.
- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.
- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.
- The Investment Manager excludes companies:

- that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes

- ***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?***

To ensure the sustainable investments do no significant harm DNSH to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

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, anti-corruption and anti-bribery matters.

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

The model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental

and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines

*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 the EU 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

Yes. The Investment Manager proactively considers PAIs of investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[62] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[63] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[64] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of companies domiciled in Continental Europe or which have significant Continental European operations. These may include large, medium and smaller companies. The Portfolio is actively managed in reference to the FTSE World Europe ex UK Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

There will be no particular specialisation. The select investment approach means that the Portfolio has the flexibility to take significant stock and sector positions.

The Portfolio aims to compare favourably with the FTSE World Europe ex UK Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a

[62] PAIs are considered as part of engagement prioritisation.
[63] Exclusion relates to coal investments only.
[64] Exclusion relates to coal investments only.

company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the FTSE World Europe ex UK Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the FTSE World Europe ex UK Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**")

and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

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

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 90% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality

Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**

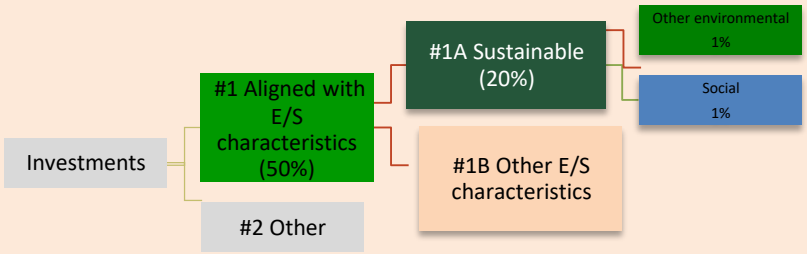
Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.




**#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.

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.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

**To what minimum extent are sustainable investments with an environmental objective aligned with**

**the EU Taxonomy?**

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[65]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

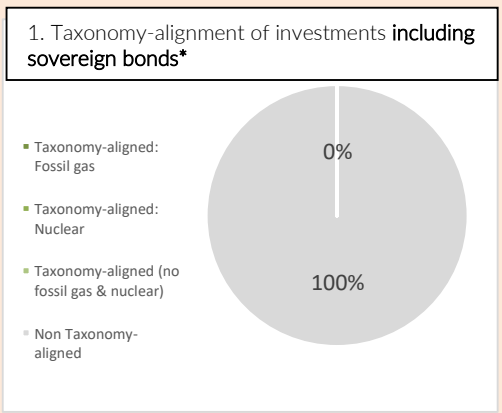
☒ No

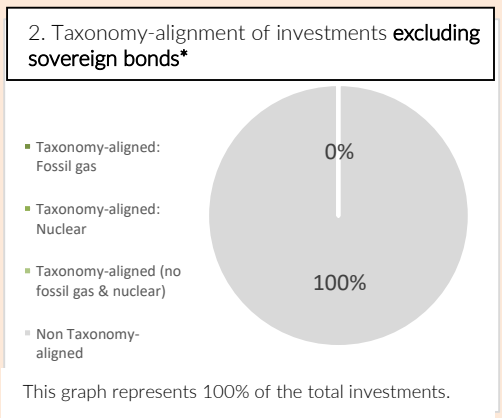
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

[65] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the FTSE World Europe ex UK Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website:**

More product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) EUROPEAN HIGH YIELD BOND

**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**

**Product name:** CT (Lux) European High Yield Bond (the "**Portfolio**")

**Legal entity identifier:** 54930067E3IWWEY1X181

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model to create a portfolio that has a more positive ESG Materiality score than its benchmark, the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

The Portfolio maintains a positive ESG Materiality rating compared to the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems. The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:
  - that it determines are in breach of accepted international standards, for example the UN Global

Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes

- ***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?***

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, anti-corruption and anti-bribery matters.

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy

that no significant harm has taken place through desk-based research or company engagement.

All bonds issued by companies are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating or that are not assessed by the ESG Materiality Rating Model.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the fund relate to fossil fuel exposure, global norms, and controversial weapons. In addition, it considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[66] |
|---|---|---|
| Indicators Applicable to Investments in Corporate Issuers | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[67] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[68] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek a total return from income and capital appreciation by investing principally in Euro or Sterling denominated fixed income securities that are rated below investment grade. The Portfolio will principally invest in fixed income securities issued by companies domiciled in Europe, or with significant European operations. The Portfolio is actively managed in reference to the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.
Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate

[66] PAIs are considered as part of engagement prioritisation.
[67] Exclusion relates to coal investments only.
[68] Exclusion relates to coal investments only.

how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index over rolling 12-month periods.

The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

The binding elements of the strategy that are used to select investments for the promotion of environmental and social characteristics only apply to bonds issued by companies.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least two-thirds of the total nets assets of the Portfolio excluding

investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

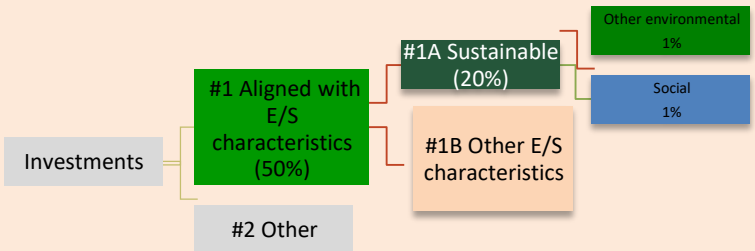
Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;
(iii) derivatives for hedging purposes;
(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics; and
(v) investments in bonds not issued by companies, such as government bonds.

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.




**#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.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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.

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

Where the Investment Manager takes long exposure to a company through the use of single named security derivatives, these are treated like a direct investment and are subject to the same criteria to promote environmental or social characteristics that is outlined above. Short exposure taken in single named security derivatives will only be used as part of the calculation towards the portfolio comparing favourably with an index on material ESG criteria. These short positions will not however be subject to the exclusion screening.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[69]?***

☐ Yes:

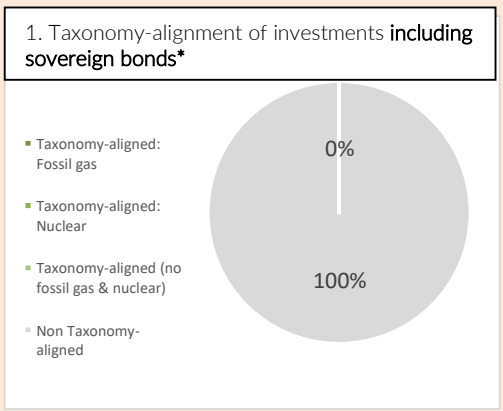
☐ In fossil gas ☐ In nuclear energy

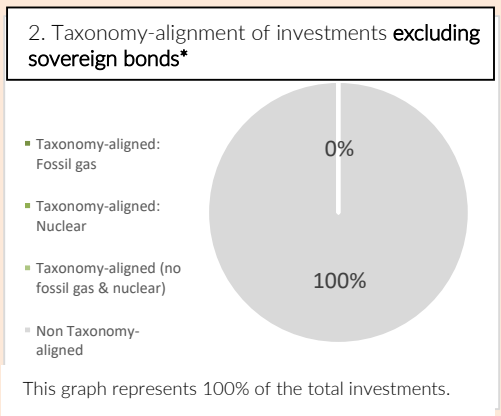
☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

**What is the minimum share of sustainable investments with an environmental objective that are**

[69] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

**not aligned with the EU Taxonomy?**

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All fixed income investments, excluding bonds issued by non-corporate issuers such as governments, are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating Model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

However, when assessing bonds that are not issued by companies (such as government bonds), ESG factors are integrated into investment research, which uses the internal ESG scores of non-corporate issuers.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

In addition, as a minimum safeguard if the fund gains exposure to a diversified set of companies through the use of index based derivatives, these exposures will be monitored to ensure that the total long exposure to excluded companies does not make up a significant proportion of the derivative or the fund

**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.

The Portfolio does not use the ICE BofA European Currency High Yield Excluding Subordinated Financials Constrained Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) Pan European Smaller Companies

**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**

**Product name:** CT (Lux) Pan European Smaller Companies (the "**Portfolio**")

**Legal entity identifier:** 549300FG0S32L53EKJ87

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Europe Small Cap Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities,in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.
- The Investment Manager excludes companies that:
    - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
    - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.
- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Europe Small Cap Index assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.
- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.
- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

    - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
    - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

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, anti-corruption and anti-bribery matters.

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.
This model identifies harm by using a quantitative threshold against a selection of PAI indicators.

Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | **Exclusions** | **Stewardship**[70] |
|---|---|---|

[70] PAIs are considered as part of engagement prioritisation.

| | | |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[71] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[72] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of European Smaller Companies. The Portfolio is actively managed in reference to the MSCI Europe Small Cap Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the MSCI Europe Small Cap Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-

[71] Exclusion relates to coal investments only.
[72] Exclusion relates to coal investments only.

making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Europe Small Cap Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Europe Small Cap Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles, as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 75% of the total nets assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.
At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the

Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards**.**

**Concerning the other investments (#2 Other):**

Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

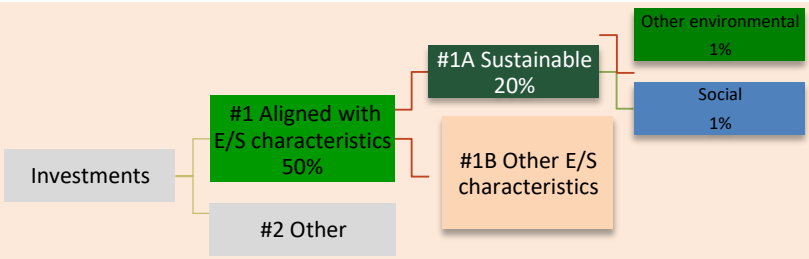
(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

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

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.

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[73]?***

☐ Yes:

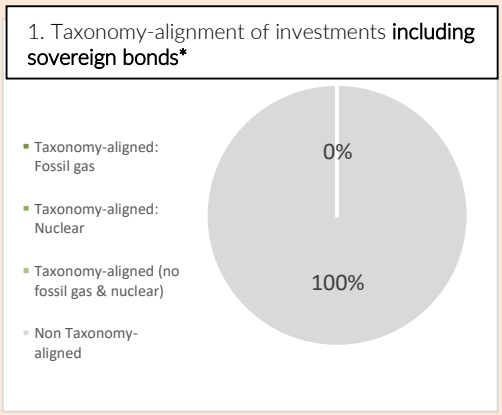
☐ In fossil gas ☐ In nuclear energy

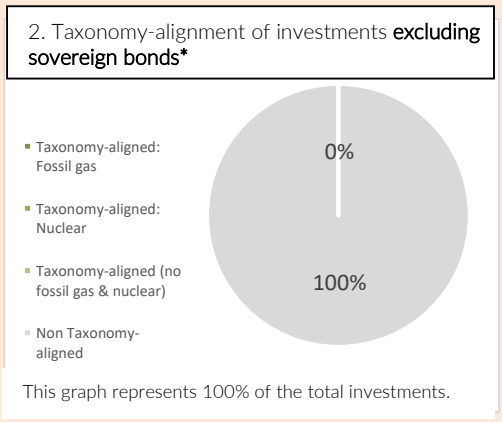
☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

[73] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (rating 4 or 5) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI Europe Small Cap Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) European Corporate Bond

**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**

**Product name:** CT (Lux) European Corporate Bond (the "**Portfolio**")

**Legal entity identifier:** 549300MRKNETV49EZ274

## 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:** ___ % | ☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the iBoxx Euro Corporate Bond Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:
  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

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

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the iBoxx Euro Corporate Bond Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

- that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and
- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.
- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.
- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) and (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating

activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

All bonds issued by companies are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating or that are not assessed by the ESG Materiality Rating Model.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?".*

| | **Exclusions** | **Stewardship[74]** |
|---|---|---|
| Indicators Applicable to Investments in Corporate Issuers | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |

[74] PAIs are considered as part of engagement prioritisation.

| | | |
|---|---|---|
| 1.4. Exposure to companies active in the fossil fuel sector[75] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[76] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to achieve a total return from income and capital appreciation by investing in fixed income securities that are primarily denominated in Euro. The Portfolio is actively managed in reference to the iBoxx Euro Corporate Bond Index, and invests principally in a broad range of Investment Grade fixed income securities issued by companies domiciled in Europe or which have significant European operations. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the iBoxx Euro Corporate Bond Index over rolling 12-month periods using the ESG Materiality Rating Model ("the Model").

This Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process. Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the iBoxx Euro Corporate Bond Index, on a rolling 12-month basis.

[75] Exclusion relates to coal investments only.
[76] Exclusion relates to coal investments only.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have poorer ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the iBoxx Euro Corporate Bond Index over rolling 12-month periods.

The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

The binding elements of the strategy that are used to select investments for the promotion of environmental and social characteristics only apply to bonds issued by companies.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

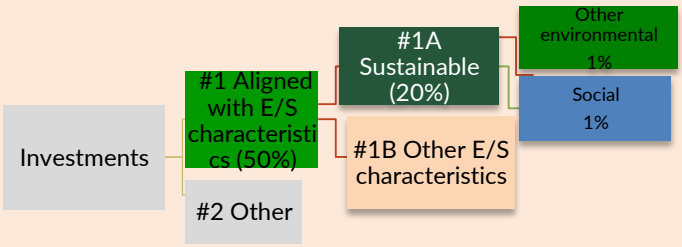
The Investment Manager ensures that at least 75% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this

50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).




**#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.

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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics; and

(v) investments in bonds not issued by companies, such as government bonds.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets

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

Where the Investment Manager takes long exposure to a company through the use of single named security derivatives, these are treated like a direct investment and are subject to the same criteria to promote environmental or social characteristics that are outlined above. Short exposure taken in single named security derivatives will only be used as part of the calculation towards the portfolio comparing favourably with an index on material ESG criteria. These short positions will not, however, be subject to the exclusion screening.

**To what minimum extent are sustainable investments with an environmental objective aligned with**

**the EU Taxonomy?**

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[77]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

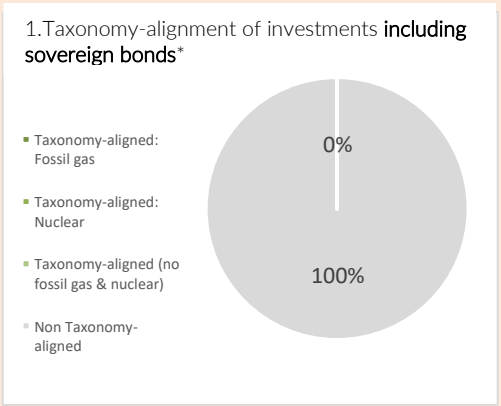
☒ No

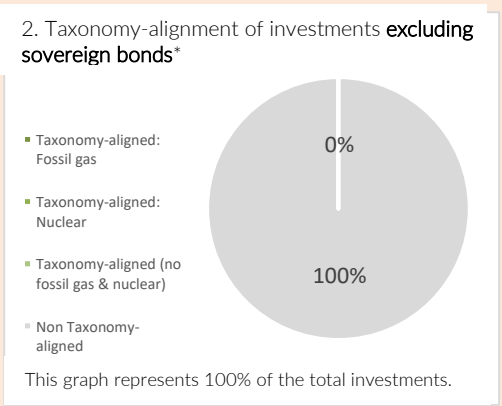
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with

[77] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

either an environmental or social objective.

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

All fixed income investments, excluding bonds issued by non-corporate issuers such as governments, are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

However, when assessing bonds that are not issued by companies (such as sovereign bonds), ESG factors are integrated into investment research, which uses internal ESG scores of non-corporate issuers.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

In addition, as a minimum safeguard if the Portfolio gains exposure to a diversified set of companies through the use of index based derivatives, these exposures will be monitored to ensure that the total long exposure to excluded companies does not make up a significant proportion of the derivative or the Portfolio.

**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?**

The Portfolio does not use the iBoxx Euro Corporate Bond Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) Global Corporate Bond

**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**

**Product name:** CT (Lux) Global Corporate Bond (the "**Portfolio**")

**Legal entity identifier:** 549300SUFYEH07NXZV66

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the Bloomberg Global Aggregate Corporate Index (USD Hedged), over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

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

In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the Bloomberg Global Aggregate Corporate Index (USD Hedged), assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global

Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

All bonds issued by companies are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating or that are not assessed by the ESG Materiality Rating Model.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | Exclusions | Stewardship[78] |
|---|---|---|
| Indicators Applicable to Investments in Corporate Issuers | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[79] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[80] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

The Portfolio seeks to achieve a total return from income and capital appreciation. The Portfolio is actively managed in reference to the Bloomberg Global Aggregate Corporate Index (USD Hedged), and invests principally, either directly or indirectly through derivatives, in a portfolio focused on Investment Grade corporate debt fixed income and floating rate securities, and when determined appropriate cash and Money Market Instruments.

The Portfolio aims to compare favourably with the Bloomberg Global Aggregate Corporate Index (USD Hedged) over rolling 12-month periods using the ESG Materiality Rating Model ("the Model").

This Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

[78] PAIs are considered as part of engagement prioritisation.
[79] Exclusion relates to coal investments only.
[80] Exclusion relates to coal investments only.

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

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the Bloomberg Global Aggregate Corporate Index (USD Hedged), on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the Bloomberg Global Aggregate Corporate Index (USD Hedged) over rolling 12-month periods.

The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

## 5. Engagement

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

The binding elements of the strategy that are used to select investments for the promotion of environmental and social characteristics only apply to bonds issued by companies.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

Tax quality: including tax reporting and corporate tax gap.

Asset allocation describes the share of investments in specific assets.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 75% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

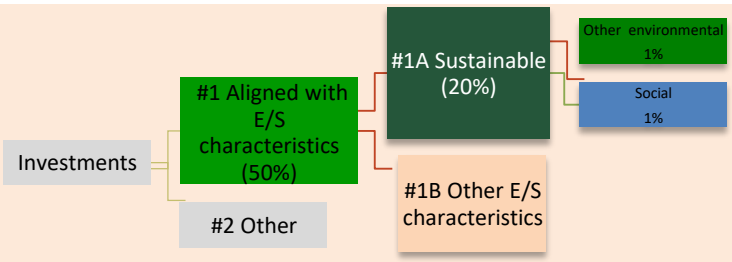
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics; and

(v) investments in bonds not issued by companies, such as government bonds.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.




**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the

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.

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.

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

Where the Investment Manager takes long exposure to a company through the use of single named security derivatives, these are treated like a direct investment and are subject to the same criteria to promote environmental or social characteristics that is outlined above. Short exposure taken in single named security derivatives will only be used as part of the calculation towards the portfolio comparing favourably with an index on material ESG criteria. These short positions will not, however, be subject to the exclusion screening.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[81]?***

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.

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

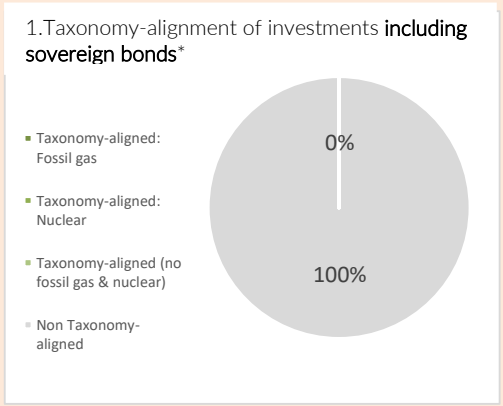
☒ No

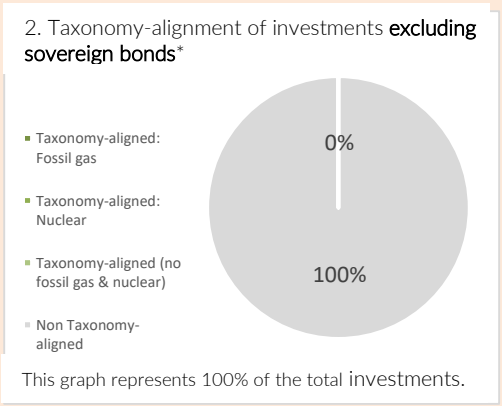
[81] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All fixed income investments, excluding bonds issued by non-corporate issuers such as governments, are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating Model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

However, when assessing bonds that are not issued by companies (such as government bonds), ESG factors are integrated into investment research, which uses the internal ESG scores of non-corporate issuers.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

In addition, as a minimum safeguard if the Portfolio gains exposure to a diversified set of companies through the use of index-based derivatives, these exposures will be monitored to ensure that the total long exposure to excluded companies does not make up a significant proportion of the derivative or the Portfolio.

**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?**

The Portfolio does not use the Bloomberg Global Aggregate Corporate Index (USD Hedged) to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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.

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

**Where can I find more product specific information online?**

More product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) Global Emerging Market Equities

**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

**Product name:** CT (Lux) Global Emerging Market Equities (the "**Portfolio**")

**Legal entity identifier:** 5493000595IG2G7M5Y50

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Emerging Markets Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (5%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Emerging Markets Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 5% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global

Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

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, anti-corruption and anti-bribery matters.

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?".*

| | **Exclusions** | **Stewardship[82]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[83] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[84] | ✓ | ✓ |

[82] PAIs are considered as part of engagement prioritisation.
[83] Exclusion relates to coal investments only.
[84] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek long-term capital appreciation. The Portfolio is actively managed in reference to the MSCI Emerging Markets Index, and invests principally in shares of Emerging Market Countries companies.

The Portfolio aims to compare favourably with the MSCI Emerging Markets Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Emerging Markets Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Emerging Markets Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 5% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio

as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

The Investment Manager ensures that at least 75% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

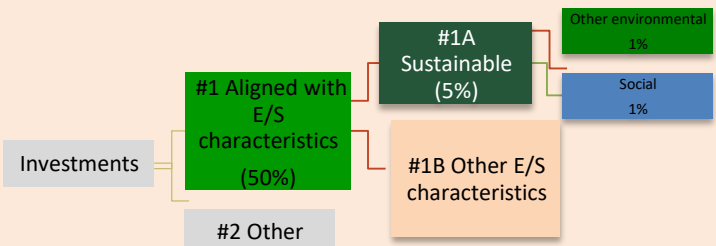
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

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.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 5% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.




**#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.

**Concerning the other investments (#2 Other):**
Other investments may include:
(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;
(iii) derivatives for hedging purposes; and
(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[85]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

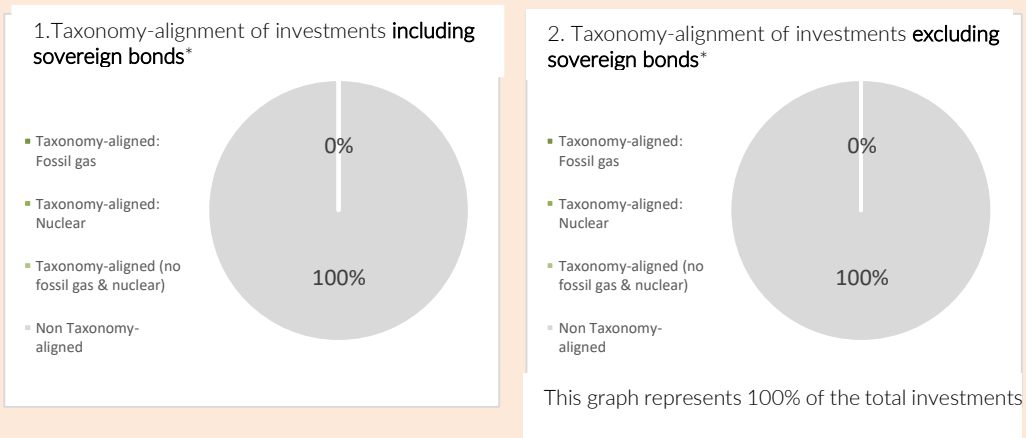
☒ No

[85] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

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

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI Emerging Markets Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) European Social Bond

**Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852**

**Product name:** CT (Lux) – European Social Bond (the "**Portfolio**") **Legal entity identifier:** 549300071NVI9LFDKW96

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

**Does this financial product have a sustainable investment objective?**

| ●● ☒ **Yes** | ●○ ☐ **No** |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% | ☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___ % of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☐ with a social objective |
| ☒ It will make a minimum of **sustainable investments with a social objective:** 80% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

**What is the sustainable investment objective of this financial product?**

The sustainable investment objective of the Portfolio is to provide positive social outcomes by investing in bonds that support or fund socially beneficial activities and development, as assessed by the Columbia Threadneedle Social Rating Methodology.

To achieve the social objective of the Portfolio, the Investment Manager:

(i) invests in bonds that positively contribute to one or more of the areas of social outcome below. These are based on the social hierarchy of needs approach, whereby "primary" social needs such as housing are foundational and supersede more general social needs. The social outcomes are also aligned to the UN Sustainable Development Goals (SDGs), as the core global set of priorities for social and sustainable development.

The Investment Manager uses a proprietary categorisation and rating model (the "Social Rating Methodology") to carry out a detailed assessment of the bond's contribution to the social objective pursued by the Portfolio. The Investment Manager only selects bonds that are rated as social investments for inclusion in the Portfolio.

| **Social Outcome Category** | **Primary SDG** | **Areas of Social Outcome** |
|---|---|---|
| Primary Social Needs | Sustainable Cities and Communities | Affordable Housing e.g. Social bonds (housing focus) |
| Basic Social Needs | Good Health and Well Being | Health and Welfare e.g. Health services |
| Social Enabling | Quality Education | Education and Training e.g. Printing and publishing |
| Social Empowerment | Decent Work and Economic Growth | Employment<br>e.g. Retail |
| Social Enhancement | Sustainable Cities and Communities | Community e.g. Social bonds (community focus) |
| Social Facilitation | Reduced Inequalities | Access to Services<br>e.g. Financial services (socially focused) |
| Societal Developments | Industry, Innovation and Infrastructure | Economic Regeneration and Development<br>e.g. Green bonds |

(ii) excludes bonds from issuers that:

- derive revenue above specific thresholds from industries or activities that it considers offer minimal social benefits or have a high risk of negative outcomes on society and/or the environment;
- breach accepted international standards and principles of governance as determined by the Investment Manager such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.

(iii) engages with issuers to enhance the Portfolio's social focus and standards. As a bondholder, the Investment Manager actively seeks opportunities to engage with issuers to better understand and positively influence their social value.

The Portfolio does not use a reference benchmark to achieve the social objective.

- ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

The Investment Manager uses the following sustainability indicators to measure the attainment of the social objective of the Portfolio:

- The number of bonds that are categorised and rated as social investments (sustainable investments) under the Social Rating Methodology.
- The number of bonds from issuers determined to be in breach of the Portfolio's exclusion criteria.

- ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

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, anti-corruption and anti-bribery matters.

The Portfolio screens out bonds from issuers that derive revenue above specific thresholds from industries or activities that offer minimal social benefits or have a high risk of negative outcomes on society and/or the environment. The Investment Manager assesses bonds against the Portfolio's exclusion criteria to determine whether an issuer is harming environmental and/or social themes such as climate transition, controversial weapons, and breaches of the United Nations Global Compact.

Principal adverse impacts are also considered as part of the do not significant harm test (as described below in the relevant section) and the Investment Manager will further disclose the principal adverse sustainability indicators in Annex I (table 1 and table 3 for the indicators on incidents of discrimination, average freedom of expression score and average corruption score) of the RTS of the SFDR.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as social investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

The model identifies harm by using a quantitative threshold against a selection of principal adverse impact indicators. Issuers which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams endeavour to satisfy that no significant harm has taken place by deploying their best efforts to obtain the information by carrying out additional research or making reasonable assumptions through desk-based research or engagement with the management team of the company.

In addition, all holdings must comply with a set of social and environmental exclusions which seek to avoid harming sustainability factors, as detailed below.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes bonds from issuers which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess issuers for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

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

☒ Yes

The Investment Manager proactively considers the principal adverse impacts ("PAIs") of its investment decisions that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators that cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, non-renewable energy production, global norms, and controversial weapons. In addition, it considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination and board gender diversity.

More information on how the Investment Manager considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of principal adverse indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[86]** |
|---|---|---|
| **Indicators Applicable to Investments in Corporate Issuers** | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.8. Emissions to water | | ✓ |
| 1.9. Hazardous waste and radioactive waste ratio | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises | | ✓ |
| 1.12. Unadjusted gender pay gap | | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |
| **Indicators Applicable to Investments in Sovereigns and Supranationals** | | |
| 3.19. Average freedom of expression score | ✓ | |

[86] Engagement activity primarily contributes to the Portfolio's social objective to mobilise capital to support inclusion and address deprivation. While recognising the merits of assessing and monitoring the Portfolio's position in relation to the Paris Agreement and related trends, such as the energy transition, the Portfolio has a specific social objective that defines the strategy. As a bondholder, the Investment Manager actively seeks opportunities to engage with issuers to better understand and positively influence their social value. As part of this, the sustainability risks associated with the Paris Agreement's objectives are considered.

| | | |
|---|---|---|
| 3.21. Average corruption score | ✓ | |

☐ No

**What investment strategy does this financial product follow?**

The Portfolio is actively managed and seeks to achieve a total return from income and capital appreciation by investing in bonds that are considered to provide positive social outcomes by supporting or funding socially beneficial activities and development, as assessed by the Social Rating Methodology.

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

Subject to the social investment criteria below, the Investment Manager invests at least 90% of the Portfolio's assets in bonds issued by governments, supranationals, public, private or voluntary and/or charitable sector organisations, principally in Europe.

This includes corporate bonds, sovereign bonds, covered bonds, agency bonds, mortgage and asset-backed securities and contingent convertible bonds, whether interest is paid at a fixed, floating, variable or index-linked rate or not payable at all. The Portfolio will not invest more than 10% of its assets in bonds that are rated below investment grade, provided that such securities are not rated below B- or equivalent by any recognised rating agency at the time of purchase.

To achieve the social objective of the Portfolio, the Investment Manager:

(i) uses the Social Rating Methodology to:

- identify categories of bonds with higher potential for delivering positive social outcomes in one of the 7 areas of social outcome set out above; and
- assess each bond to produce a categorisation and social rating following a detailed assessment of the bond's contribution to the social objective of the Portfolio.

(ii) excludes bonds from issuers that:

- derive revenue above specific thresholds from industries or activities that it considers offer minimal social benefits or have a high risk of negative outcomes on society and/or the environment;
- breach accepted international standards and principles of governance as determined by the Investment Manager such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.

(iii) maintains and enhances the Portfolio's social focus and standards through ongoing governance, monitoring, engagement and reporting.

The Portfolio is not managed in reference to a benchmark.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The Investment Manager only selects bonds that meet the Social Investment Criteria below in order to achieve the social objective of the Portfolio.

**1. Social Rating Methodology**

To be eligible for investment, each bond must positively contribute to one or more of the 7 areas of social outcome (set out above). Under the methodology, the social characteristics of each bond are assessed and each investment is categorised according to its level of impact and given a social rating.

(i) The Investment Manager identifies the social intentionality and purpose of the use of a bond's

proceeds and the bond is categorised according to its level of impact as:

- an impact investment where a bond's use of proceeds has a clear social objective
- an investment with impact, where a bond's use of proceeds does not have a clear social objective, but where positive social benefit is nonetheless identifiable
- development finance where a bond's use of proceeds supports investments in infrastructure and economic development for positive social contribution otherwise the investment is considered general financing and is not eligible for investment by the Portfolio; and

(ii) the Investment Manager assesses the intensity of a bond's social focus by scoring each bond against 9 indicators (such as the bond's ability to tackle deprivation by assessing the target population and region) to produce an overall rating of minor, moderate, good or strong. Any bond rated, or whose rating falls below, minor is subject to review and may be re-categorised as general financing and therefore no longer eligible to be held by the Portfolio.

The categorisation and ratings are then used by the Investment Manager in constructing the portfolio.

**2. Exclusions: revenue thresholds**

The Portfolio does not invest in issuers which derive revenue from industries or activities above specific thresholds where the Investment Manager considers that those industries or activities offer minimal social benefits or which represent a high risk of negative outcomes on society and/or the environment

In addition, the Investment Manager will not invest in bonds from issuers which are funding new thermal coal mining or power generation facilities.

However, an investment may be made in bonds that have ring fenced or specific use of proceeds, such as Green, Social or Sustainability bonds, from an issuer that would otherwise be excluded under the revenue threshold exclusions above. Investment in bonds issued by governments is only permitted via Green, Social or Sustainability Bonds.

Furthermore, the Portfolio complies with the Paris-aligned Benchmark exclusions contained in Article 12 (1) (a)-(g) of Commission Delegated Regulation (EU) 2020/1818).

**3. Exclusions: breach of international standards**

The Portfolio excludes issuers that breach accepted international standards and principles as determined by the Investment Manager, such as, but not limited to, the United Nations Global Compact, the UN International Labour Organization Labour Standards, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

Full details of the current exclusions and revenue thresholds, which may be updated from time to time, are set out in the Portfolio's Social Investment Guidelines and the Article 10 SFDR disclosure, available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Engagement**

The Investment Manager is keen to ensure that the negative social impacts of the net zero transition are minimised, and aims to confront these challenges by actively engaging with issuers on this topic to promote inclusive growth. After a period of engagement, the Investment Manager will review the bonds issued by companies with a material climate change impact which have a poor low-carbon transition strategy or which are not sufficiently addressing the social consequences of transition (unless these bonds are specifically funding sustainable or social projects).

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative (NZAMI) and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio as part of its social objective.

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

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

All issuers in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess an issuer's governance practices and supplements this with its fundamental research.

Pre-investment: The Investment Manager assesses all issuers before investment. It may engage with an issuer to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the issuer demonstrates poor governance practices, the Investment Manager will not invest in its bonds.

Post-investment: Issuers are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the issuer to better understand these as part of its review. However, where it is considered that the issuer no longer demonstrates good governance practices, the bonds will be divested from the Portfolio, as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of issuers. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

**What is the asset allocation and the minimum share of sustainable investments?**

**Concerning the planned proportion of investments used to meet the sustainable investment objective of the the Sub-Fund (#1 Sustainable ):**

**Asset allocation** describes the share of investments in specific assets.

The Portfolio invests at least 80% of its total net assets in sustainable investments which for the Portfolio are considered to be bonds that provide positive social outcomes by supporting or funding socially beneficial activities and development, as assessed by the Social Rating Methodology.

The minimum proportion of sustainable investments held by the Portfolio is 80% to cover the fact that ancillary liquid assets may be held by the Portfolio under unfavourable market conditions, as described below. In practice, all investments included in the Portfolio will be sustainable investments with the exception of (i) ancillary liquid assets (i.e., bank deposits at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

The Investment Manager applies the Social Investment Criteria (set out above) to calculate the proportion of sustainable investments in the Portfolio. All bonds rated as social investments by the Social Rating Methodology count fully towards the portfolio alignment with sustainable investments, after the Portfolio's DNSH test is applied.

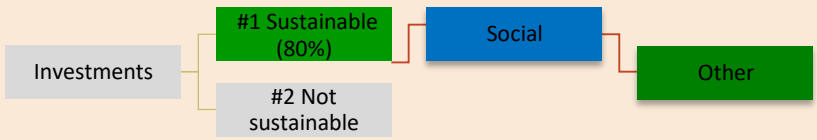
**Concerning the other investments which are not sustainable investments category (#2 Not sustainable):**

Other investments which are not sustainable investments within the meaning of Article 2(17) are: (i) ancillary liquid assets (i.e. bank deposits at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; (iii) derivatives for hedging purposes.

These other investments are not used to meet the sustainable investment objective of the Portfolio. However, the Portfolio will apply minimum environmental or social safeguards to ensure that such investments will not affect the delivery of the Portfolio's overarching sustainable investment objective on a continuous basis (see details below).

The maximum proportion of investments that may be held by the Portfolio in this category is 20% to take into account ancillary liquid assets that may be held under unfavourable market conditions.

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.




**#1 Sustainable** covers sustainable investments with environmental or social objectives.

**#2 Not sustainable** includes investments which do not qualify as sustainable investments.

- ***How does the use of derivatives attain the sustainable investment objective?***

The Portfolio does not use derivatives for the purposes of attaining the sustainable investment objective.

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

The Portfolio does not commit to holding a minimum proportion in sustainable investments with an environmental objective aligned with the EU Taxonomy.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[87]?***

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.

☐ Yes:

- ☐ In fossil gas
- ☐ In nuclear energy

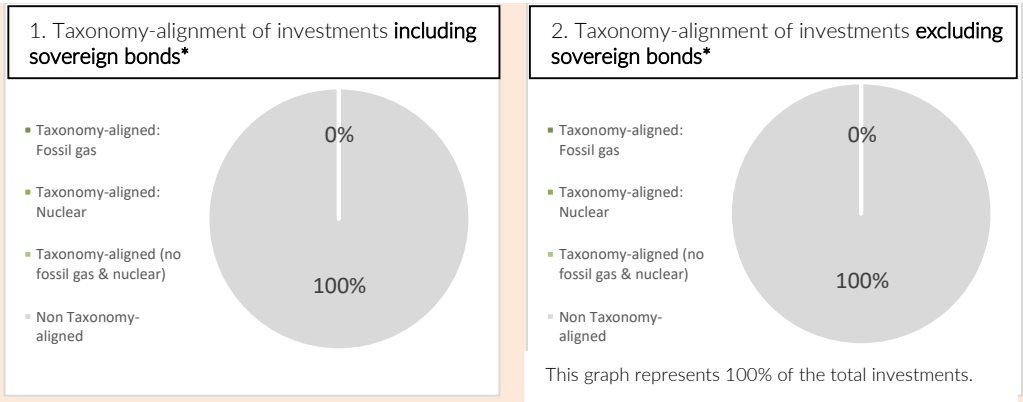
☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

[87] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Enabling activities directly enable other activities to make a substantial contribution to 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.




**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?***

Not Applicable.

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

0%. The Portfolio does not have an environmental objective.

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

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

The minimum share of sustainable investments with a social objective is 80%.

**What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?**

For the purposes of managing liquidity, the Portfolio may hold ancillary liquid assets (i.e. bank deposits at sight), and may also hold bank deposits, money market instruments or money market funds for treasury purposes.

Minimum environmental or social safeguards are applied to ancillary liquid assets, bank deposits and derivatives used for hedging purposes, through the integration of ESG considerations into the Investment Manager's counterparty risk assessment.

**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**
Not Applicable.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

Not Applicable.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:
https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund/

Further information on the Portfolio's investment guidelines is included in the Social Investment Guidelines available via the link above.
The Investment Manager publishes a social impact report each year which is also available at:
https://www.columbiathreadneedle.com

# CT (Lux) Japan Equities

**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**

**Product name:** CT (Lux) Japan Equities (the "**Portfolio**")

**Legal entity identifier:** 5493000LMPLEZ8VQSU41

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5 % of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Japan Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (5%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Japan Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 5% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

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, anti-corruption and anti-bribery matters.

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.
- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.
- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?".*

| | **Exclusions** | **Stewardship[88]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[89] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[90] | ✓ | ✓ |

[88] PAIs are considered as part of engagement prioritisation.
[89] Exclusion relates to coal investments only.
[90] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio looks to outperform the MSCI Japan Index after deduction of charges. The Portfolio is actively managed in reference to the MSCI Japan Index, and invests principally in equity securities issued by companies domiciled in Japan, or with significant Japanese activities, including through depositary receipt.

The Portfolio aims to compare favourably with the MSCI Japan Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Japan Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with MSCI Japan Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 5% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring

of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

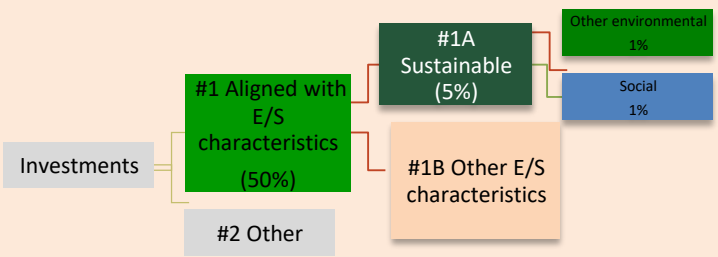
The Investment Manager ensures that at least 90% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 5% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[91]?***

☐ Yes:

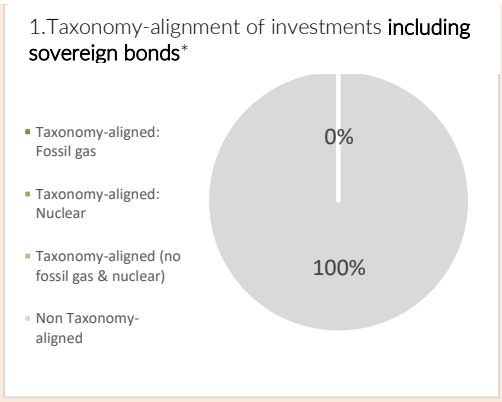
☐ In fossil gas ☐ In nuclear energy

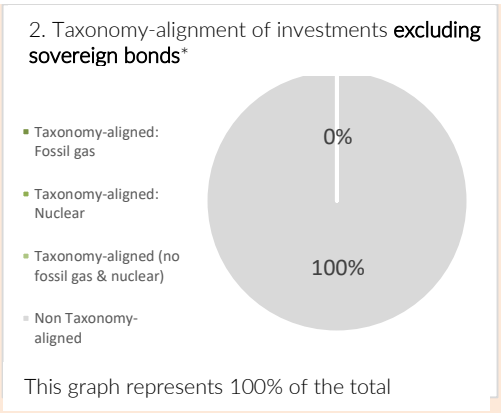
☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

[91] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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.




**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?***

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

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

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI Japan Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

Not applicable.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) Pan European Focus

**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.

**Product name:** CT (Lux) Pan European Focus (the "**Portfolio**")

**Legal entity identifier:** 5493002FBG0GVPH39L63

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Goverance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Europe Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with ESG ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities,in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.
- The Investment Manager excludes companies that:
    - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
    - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.
- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Europe Index assessed over rolling 12-month periods, using the ESG Materiality Rating model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.
- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.
- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

    - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles and;
    - that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

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, anti-corruption and anti-bribery matters.

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and Investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of principal adverse indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[92] |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[93] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[94] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to seek capital growth through investment in a concentrated portfolio of equity securities. The Portfolio is actively managed in reference to the MSCI Europe Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the MSCI Europe Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5

[92] PAIs are considered as part of engagement prioritisation.
[93] Exclusion relates to coal investments only.
[94] Exclusion relates to coal investments only.

indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the MSCI Europe Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Europe Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

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

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 90% of the total net assets of the Portfolio, excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own fundamental research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not

covered by its ESG Materiality Rating, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

**Concerning the other investments (#2 Other):**
Other investments may include

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

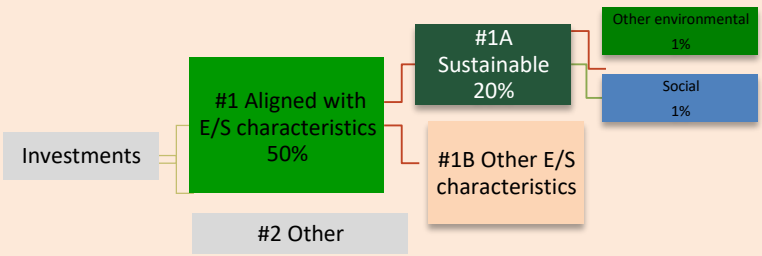
(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net 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.




**#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.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

**To what minimum extent are sustainable investments with an environmental objective aligned**

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.

**with the EU Taxonomy?**

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[95]?***

☐ Yes:

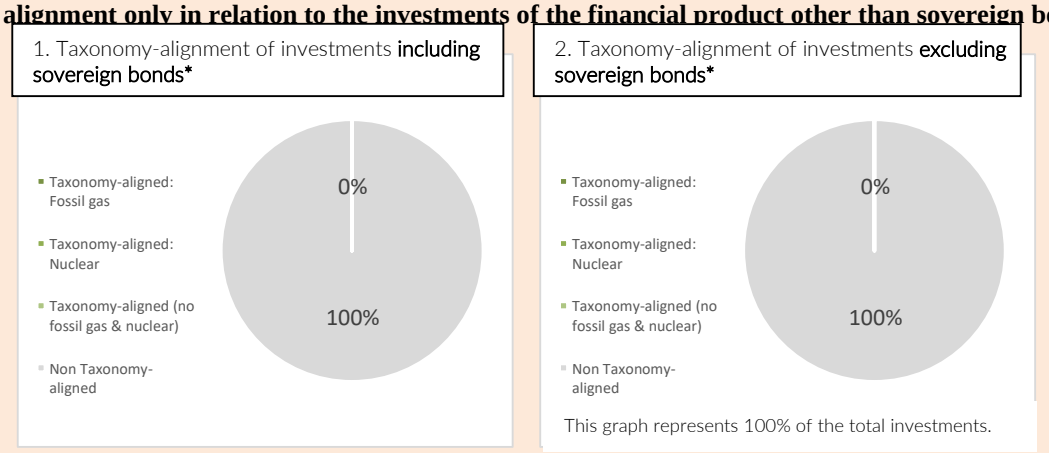
☐ In fossil gas ☐ In nuclear energy

☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable

[95] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI Europe Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (Lux) Pan European Small Cap Opportunities

**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

**Product name:** CT (Lux) Pan European Small Cap Opportunities (the "**Portfolio**")

**Legal entity identifier:** 54930003H2F9R836UM93

# 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the MSCI Europe Small Cap Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks. The Investment Manager invests at least 15% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (15%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the MSCI Europe Small Cap Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?".*

| | **Exclusions** | **Stewardship[96]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[97] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[98] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |

[96] PAIs are considered as part of engagement prioritisation.
[97] Exclusion relates to coal investments only.
[98] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio is actively managed in reference to the MSCI Europe Small Cap Index, and invests principally in the equity securities of European Smaller Companies.

The Portfolio aims to compare favourably with the MSCI Europe Small Cap Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of MSCI Europe Small Cap Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the MSCI Europe Small Cap Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong

ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 15% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio

as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

The Investment Manager ensures that at least 75% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

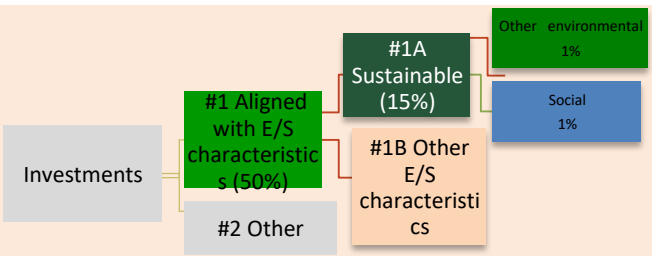
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

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.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 15% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

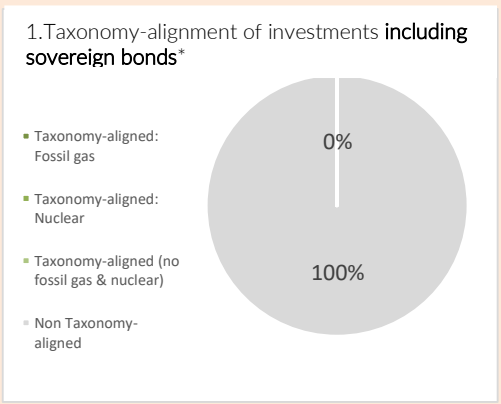
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[99]?***

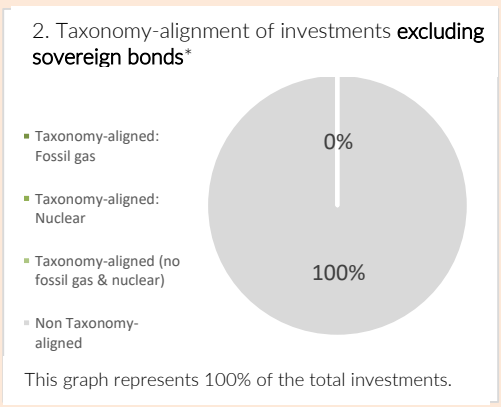
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




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

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 15% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 15% of sustainable investments overall with either an environmental or social objective.

[99] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the MSCI Europe Small Cap Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) UK Equities

**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

**Product name:** CT (Lux) UK Equities (the "**Portfolio**")

**Legal entity identifier:** 549300XFQJOSJSM28C10

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the FTSE All-Share Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the FTSE All-Share Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global

Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[100]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[101] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[102] | ✓ | ✓ |

[100] PAIs are considered as part of engagement prioritisation.
[101] Exclusion relates to coal investments only.
[102] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio is actively managed in reference to the FTSE All-Share Index, and invests principally in the equity securities of companies domiciled in the United Kingdom or which have significant United Kingdom operations.

The Portfolio aims to compare favourably with the FTSE All-Share Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the FTSE All-Share Index , on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with FTSE All-Share Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment

Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 80% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

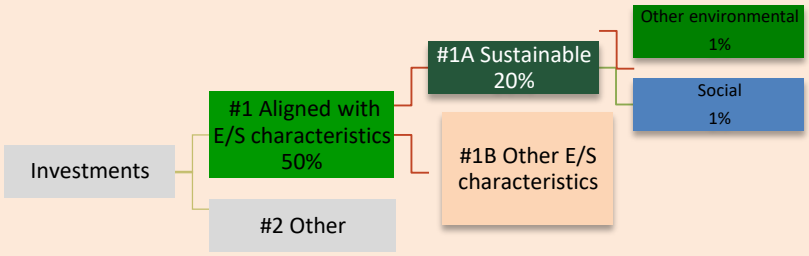
At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

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.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

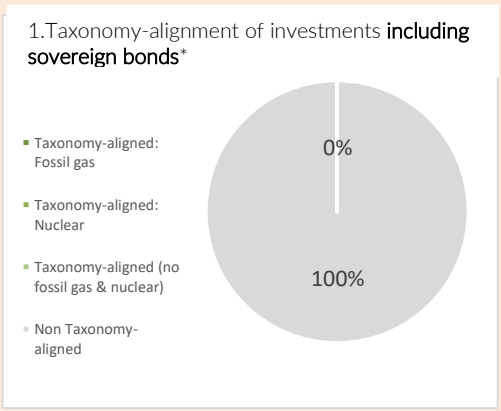
- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[103]?***

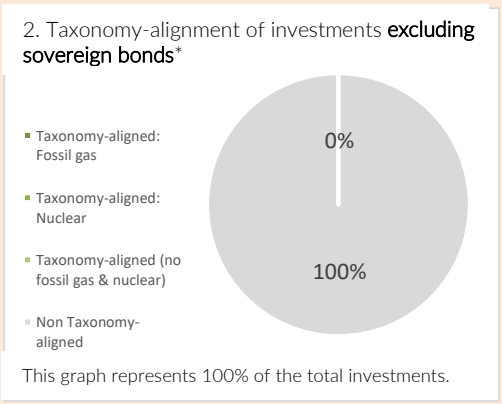
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**




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

Enabling activities directly enable other activities to make a substantial contribution to 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.

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

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the FTSE All-Share Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

[103] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

# CT (Lux) US Contrarian Core Equities

**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

**Product name:** CT (Lux) US Contrarian Core Equities (the "**Portfolio**") **Legal entity identifier:** 54930018O2H517KS6C10

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the S&P 500 Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (10%) of sustainable investments in companies that make a positive contribution to society and/or the environment. It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the S&P 500 Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 10% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

  - that derive revenue above particular thresholds from certain industries and activities that are

harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[104]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[105] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[106] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |

[104] PAIs are considered as part of engagement prioritisation.
[105] Exclusion relates to coal investments only.
[106] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek long-term capital appreciation. The Portfolio is actively managed in reference to the S&P 500 Index, and invests principally in the equity securities of large cap companies (generally over US$ 2 billion in market capitalisation, as at time of purchase) listed, domiciled, or conducting a significant part of their business in the United States.

The Portfolio aims to compare favourably with the S&P 500 Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the S&P 500 Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when

compared with the S&P 500 Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 10% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and

commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

The Investment Manager ensures that at least 90% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

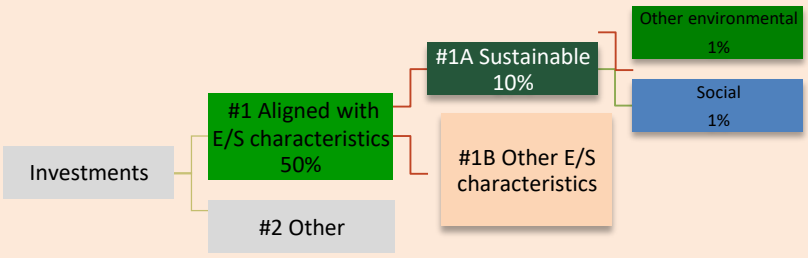
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 10% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

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.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[107]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

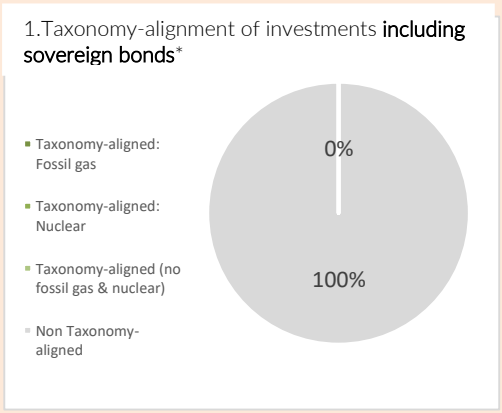
☒ No

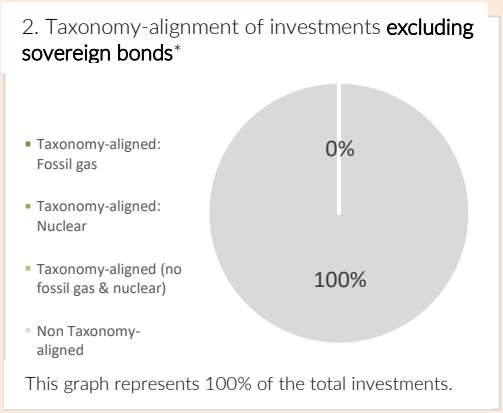
[107] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

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

**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?**

The Portfolio does not use the S&P 500 Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) American Select

**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

**Product name:** CT (Lux) American Select (the "**Portfolio**")

**Legal entity identifier:** 549300J8ZUHECEKDE474

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the S&P 500 Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the S&P 500 Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[108]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[109] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[110] | ✓ | ✓ |

[108] PAIs are considered as part of engagement prioritisation.
[109] Exclusion relates to coal investments only.
[110] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio is actively managed in reference to the S&P 500 Index, and invests principally in shares of companies domiciled in North America or which have significant North American operations.

The Portfolio aims to compare favourably with the S&P 500 Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the S&P 500 Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the S&P 500 Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment

Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least 90% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

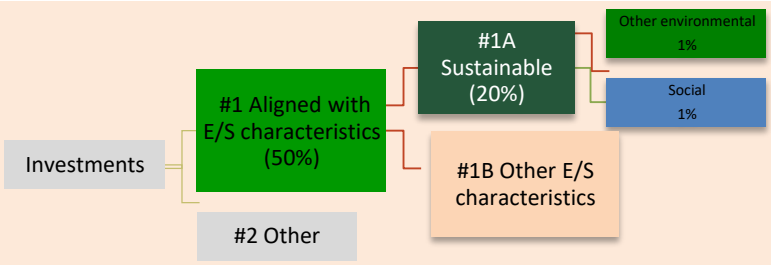
At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

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.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[111]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

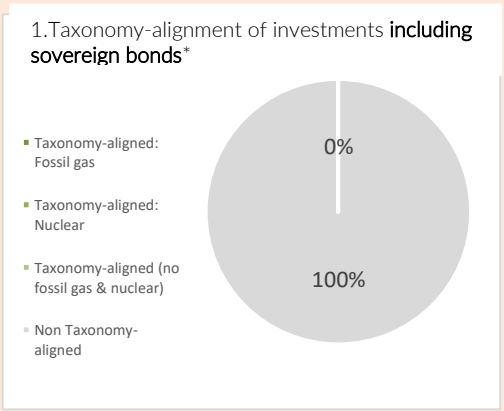
☒ No

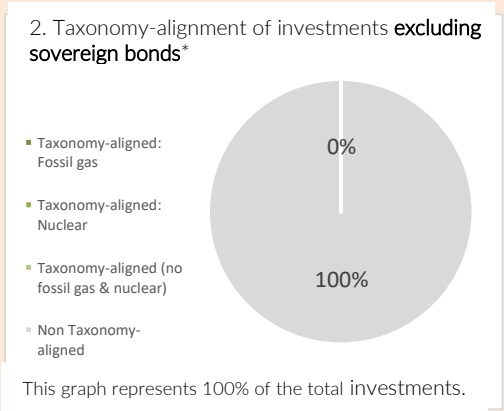
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy,** the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What investments are included under "#2 Other", what is their purpose and are there any minimum**

**environmental or social safeguards?**

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; and (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the S&P 500 Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 I find more product specific information online?**

More product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (Lux) American

**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

**Product name:** CT (Lux) American (the "**Portfolio**") **Legal entity identifier:** 549300DPU5Y0HRX49161

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the S&P 500 Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the S&P 500 Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment .

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

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, anti-corruption and anti-bribery matters.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and

social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts *on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[112]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[113] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[114] | ✓ | ✓ |

[112] PAIs are considered as part of engagement prioritisation.
[113] Exclusion relates to coal investments only.
[114] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation. The Portfolio looks to outperform the S&P 500 Index after deduction of charges. The Portfolio is actively managed in reference to the S&P 500 Index, and invests principally in shares of companies domiciled in the US or which have significant US business operations.

The Portfolio aims to compare favourably with the S&P 500 Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the S&P 500 Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**1. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the S&P 500 Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**2. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**3. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**4. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

**5. Engagement**

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("**NZAMI**") and has committed to an ambition to reach net zero emissions by 2050 or sooner for a range of assets, including the Portfolio. Accordingly, the Investment Manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the Portfolio does not show progress in meeting minimum standards considered necessary for continued investment, then the Portfolio will disinvest from the company.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment

Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

1. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

2. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

3. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

4. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

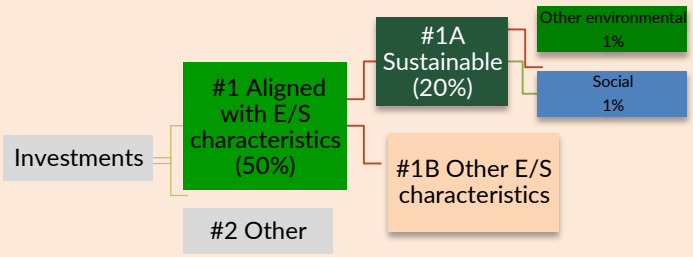
The Investment Manager ensures that at least 90% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.




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.

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

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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[115]?***

☐ Yes:

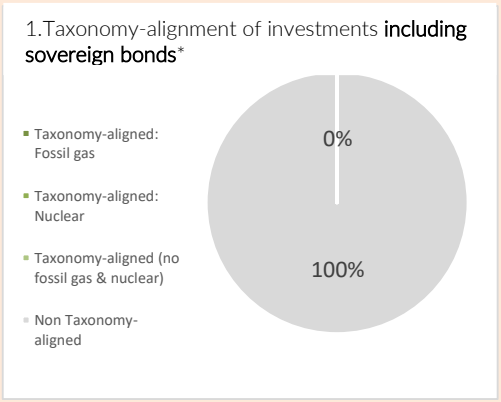
☐ In fossil gas ☐ In nuclear energy

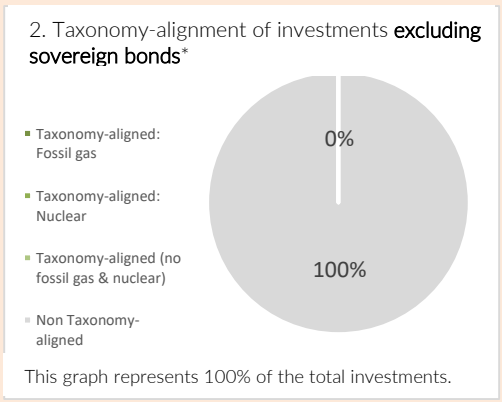
☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

[115] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

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

**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?**

The Portfolio does not use the S&P 500 Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

- ***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 product-specific information can be found on the website**
below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund

# CT (LUX) EUROPEAN SHORT-TERM HIGH YIELD BOND

## 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

**Product name:** CT (Lux) European Short-Term High Yield Bond (the "**Portfolio**")

**Legal entity identifier:** 549300VSS6TC4ESQIL03

## Environmental and/or social characteristics

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

| ●● ☐ **Yes** | ●○ ☒ **No** |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model to create a portfolio that has a more positive ESG Materiality score than the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged) Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:
  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.
- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (5%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

The Portfolio maintains a positive ESG Materiality rating compared to the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged) Index assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems. The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 5% of the Portfolio's assets in sustainable investments.
- The Investment Manager excludes companies:
  - that it determines are in breach of accepted international standards, for example the UN Global

Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes

- ***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?***

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, anti-corruption and anti-bribery matters.

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

  *How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams seek to satisfy

that no significant harm has taken place through desk-based research or company engagement.

All bonds issued by companies are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating or that are not assessed by the ESG Materiality Rating Model.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the Portfolio that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?".

| | Exclusions | Stewardship[116] |
|---|---|---|
| Indicators Applicable to Investments in Corporate Issuers | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[117] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[118] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek a total return from income with some capital appreciation.

The Portfolio will seek to deliver returns with lower volatility than that of the short-term European high yield bond market. The Portfolio is actively managed and will seek exposure, directly or indirectly, to credit rated below Investment Grade, that is issued by companies domiciled in Europe or with significant European operations, or is denominated in EUR or GBP and whose residual maturity does not exceed 4 years.

The Portfolio will invest at least 50% of its net assets directly in fixed income securities that meet the criteria above, and the Portfolio will maintain a net credit exposure as described above of at least two-thirds of its net assets.

The Portfolio aims to compare favourably with the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained Index, Excluding Subordinated Debt (EUR Hedged) over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

[116] PAIs are considered as part of engagement prioritisation.
[117] Exclusion relates to coal investments only.
[118] Exclusion relates to coal investments only.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged) Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**6. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged) Index over rolling 12-month periods.

- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**7. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**8. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**9. Sustainable Investments**

The Portfolio commits to investing at least 5% of its assets in sustainable investments.

The binding elements of the strategy that are used to select investments for the promotion of environmental and social characteristics only apply to bonds issued by companies.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

5. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
6. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
7. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
8. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

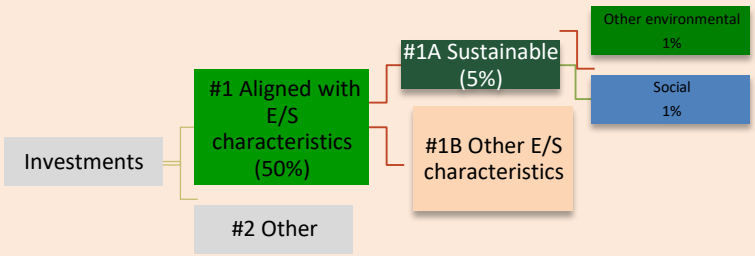
**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least two-thirds of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.
At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG

Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 5% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).




**#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.

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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(vi) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;
(vii) bank deposits, money market instruments or money market funds held for treasury purposes;
(viii) derivatives for hedging purposes;
(ix) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics; and
(x) investments in bonds not issued by companies, such as government bonds.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

- ***How does the use of derivatives attain the environmental or social characteristics promoted***

***by the financial product?***

Where the Investment Manager takes long exposure to a company through the use of single named security derivatives, these are treated like a direct investment and are subject to the same criteria to promote environmental or social characteristics that are outlined above. Short exposure taken in single named security derivatives will only be used as part of the calculation towards the portfolio comparing favourably with an index on material ESG criteria. These short positions will not however be subject to the exclusion screening.

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.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[119]?***

☐ Yes:

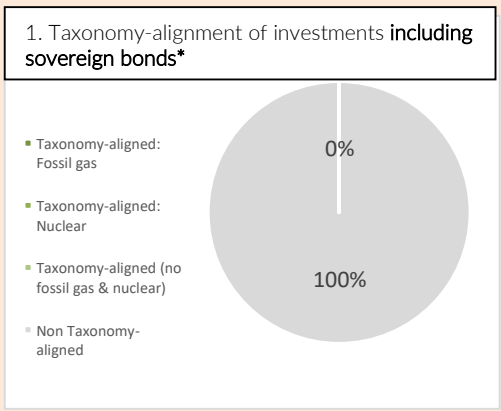
☐ In fossil gas ☐ In nuclear energy

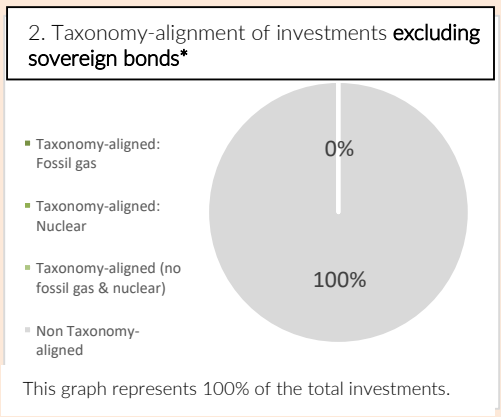
☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

[119] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

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

All fixed income investments, excluding bonds issued by non-corporate issuers such as governments, are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating Model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

However, when assessing bonds that are not issued by companies (such as government bonds), ESG factors are integrated into investment research, which uses the internal ESG scores of non-corporate issuers.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

In addition, as a minimum safeguard if the Portfolio gains exposure to a diversified set of companies through the use of index based derivatives, these exposures will be monitored to ensure that the total long exposure to excluded companies does not make up a significant proportion of the derivative or the Portfolio .

**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?**

The Portfolio does not use the ICE BofA Custom Index 0-4 Year European Currency High Yield, BB-B, 3% Constrained, Excluding Subordinated Debt (EUR Hedged) Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) EMERGING MARKET CORPORATE BONDS

## 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

**Product name:** CT (Lux) Emerging Market Corporate Bonds (the "**Portfolio**")

**Legal entity identifier:** 54930077CKAC4O141D13

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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## 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:** ___ % | ☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the J.P. Morgan CEMBI Broad Diversified Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:
  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;
  - in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

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

The Portfolio also holds a minimum proportion (5%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

The Portfolio has the following sustainability indicators reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the J.P. Morgan CEMBI Broad Diversified Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 5% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

- that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and
- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.
- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.
- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) and (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.
- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating

activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

All bonds issued by companies are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating or that are not assessed by the ESG Materiality Rating Model.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the Portfolio that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship**[120] |
|---|---|---|
| Indicators Applicable to Investments in Corporate Issuers | | |
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |

[120] PAIs are considered as part of engagement prioritisation.

| | | |
|---|---|---|
| 1.4. Exposure to companies active in the fossil fuel sector[121] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[122] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment strategy is to achieve a total return from income and capital appreciation by investing principally in U.S. Dollar-denominated or U.S. Dollar hedged Investment Grade and below Investment Grade debt and other obligations issued or guaranteed by institutions and corporations having their head office in, or conducting a significant part of their business in, Emerging Market Countries. The Portfolio is actively managed in reference to the J.P. Morgan CEMBI Broad Diversified Index. The index is broadly representative of the securities in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and the Portfolio may display significant divergence from the index.

The Portfolio aims to compare favourably with the J.P. Morgan CEMBI Broad Diversified Index over rolling 12-month periods using the ESG Materiality Rating Model (the "Model").

This Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process. Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when

[121] Exclusion relates to coal investments only.
[122] Exclusion relates to coal investments only.

compared with those of the J.P. Morgan CEMBI Broad Diversified Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have poorer ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**6. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the J.P. Morgan CEMBI Broad Diversified Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**7. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**8. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager, such as the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**9. Sustainable Investments**

The Portfolio commits to investing at least 5% of its assets in sustainable investments.

The binding elements of the strategy that are used to select investments for the promotion of environmental and social characteristics only apply to bonds issued by companies.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

5. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

6. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

7. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

8. Tax quality: including tax reporting and corporate tax gap.

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

Asset allocation describes the share of investments in specific assets.

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

The Investment Manager ensures that at least two-thirds of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

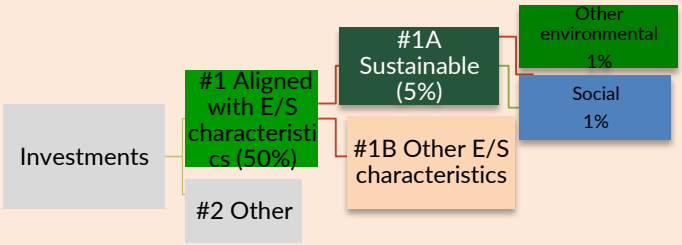
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 5% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

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.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes;

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics; and

(v) investments in bonds not issued by companies, such as government bonds.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets

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

Where the Investment Manager takes long exposure to a company through the use of single named security derivatives, these are treated like a direct investment and are subject to the same criteria to promote environmental or social characteristics that are outlined above. Short exposure taken in single named security derivatives will only be used as part of the calculation towards the portfolio comparing favourably with an index on material ESG criteria. These short positions will not, however, be subject to the exclusion screening.

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.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that***

***comply with the EU Taxonomy[123]?***

☐ Yes:

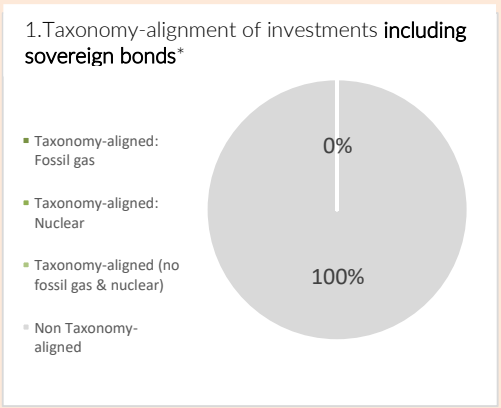
☐ In fossil gas ☐ In nuclear energy

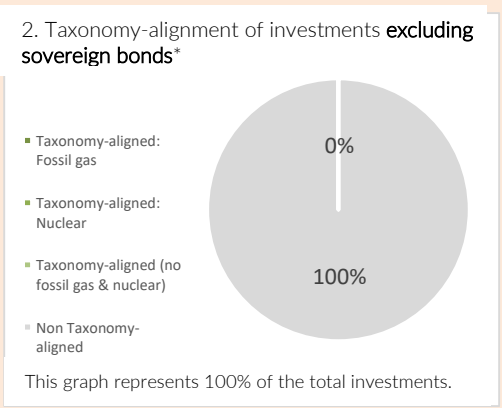
☒ No

**The two graphs below show in green the minimum percentage of investments that are 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.**

Enabling activities directly enable other activities to make a substantial contribution to 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.




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 5% of sustainable investments overall with either an environmental or social objective.

[123] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

All fixed income investments, excluding bonds issued by non-corporate issuers such as governments, are subject to the exclusion policy. This ensures minimum environmental and social safeguards are in place even for bonds issued by companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

However, when assessing bonds that are not issued by companies (such as sovereign bonds), ESG factors are integrated into investment research, which uses internal ESG scores of non-corporate issuers.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

In addition, as a minimum safeguard if the Portfolio gains exposure to a diversified set of companies through the use of index based derivatives, these exposures will be monitored to ensure that the total long exposure to excluded companies does not make up a significant proportion of the derivative or the Portfolio.

**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?**

The Portfolio does not use the J.P. Morgan CEMBI Broad Diversified Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

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

Not applicable.

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

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) US DISCIPLINED CORE EQUITIES

**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

**Product name:** CT (Lux) US Disciplined Core Equities (the "**Portfolio**")

**Legal entity identifier:** 549300EZCBHJI17ZEQ30

## 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:**___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager uses the Columbia Threadneedle Environmental, Social and Governance (ESG) Materiality Rating Model (ESG Materiality Rating Model) to create a portfolio that has a more positive ESG Materiality score than its benchmark, the S&P 500 Index, over rolling 12-month periods. To achieve this, the Investment Manager favours companies with strong ratings, as assessed by the ESG Materiality Rating Model. These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

  - derive revenue above a particular threshold from certain industries and activities that do not promote environmental or social characteristics;

  - in its opinion, are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG Materiality Ratings to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (20%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Portfolio maintains a positive ESG Materiality rating compared to the S&P 500 Index, assessed over rolling 12-month periods, using the ESG Materiality Rating Model. The positive ESG Materiality rating versus the index is monitored on a daily basis by the Investment Manager's compliance systems.

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

- The Investment Manager invests at least 20% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

- that derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over specified thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and

social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

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, anti-corruption and anti-bribery matters.

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the Portfolio that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to fossil fuel exposure, global norms, and controversial weapons. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports**.** Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "*How have the indicators for adverse impacts on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[124]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[125] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[126] | ✓ | ✓ |

[124] PAIs are considered as part of engagement prioritisation.
[125] Exclusion relates to coal investments only.
[126] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

**What investment strategy does this financial product follow?**

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

The Portfolio's investment strategy is to seek capital appreciation by investing principally in the equity securities of large cap companies (within the market capitalisation range of companies in the S&P 500 Index, as at the time of purchase) listed, domiciled or exercising a predominant part of their activity in the United States. The Portfolio is actively managed in reference to the S&P 500 Index.

The Portfolio aims to compare favourably with the S&P 500 Index over rolling 12-month periods, using the ESG Materiality Rating Model (the "Model").

The Model, owned and developed by Columbia Threadneedle, builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the Model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG Materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

Whilst the Portfolio may invest in companies with a low rating, the Investment Manager favours companies which score highly (rating of 1-3) on the Model, giving the Portfolio a positive tilt in favour of ESG characteristics when compared with those of the S&P 500 Index, on a rolling 12-month basis.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above particular thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with companies that have low ESG Materiality Ratings with a view to influencing management teams to improve their ESG practices, for example on issues relating to carbon emissions.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**5. Columbia Threadneedle ESG Materiality Rating**

- The Portfolio must maintain, overall, a positive weighted average ESG Materiality rating when compared with the S&P 500 Index over rolling 12-month periods.
- The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG Materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**6. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which derive revenue above certain thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**7. Exclusions: breach of international standards**

The Portfolio excludes companies that breach accepted international standards and principles as determined by the Investment Manager such as, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**8. Sustainable Investments**

The Portfolio commits to investing at least 20% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy. However, application of the exclusion criteria will have the effect of reducing the number of securities available for investment by the Portfolio.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

5. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.

6. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.

7. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.

8. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

The Investment Manager ensures that at least 90% of the total net assets of the Portfolio excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

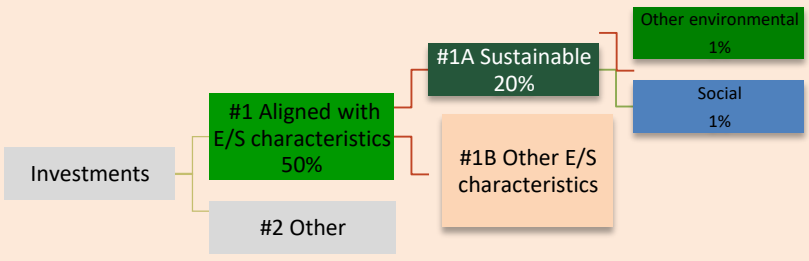
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG Materiality rating. Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 20% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

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.




**#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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG Materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

The Portfolio does not use derivatives for the purposes of attaining the environmental or social characteristics promoted by it.

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

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.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[127]?***

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

**The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of**

[127] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("clim ny ft hand margin. The Commission ac lown in

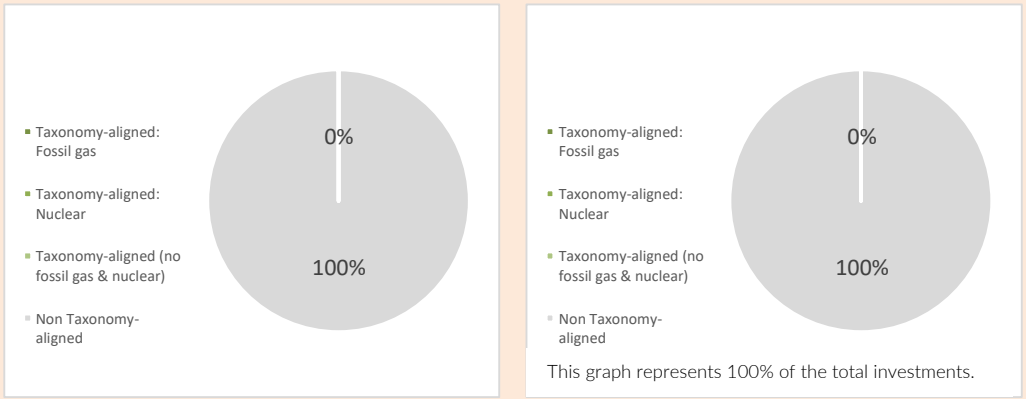
1.Taxonomy-alignment of investments including sovereign bonds*

2. Taxonomy-alignment of investments excluding sovereign bonds*

Enabling activities directly enable other activities to make a substantial contribution to 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.

**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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 20% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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.

The Portfolio does not use the S&P 500 Index to measure whether it attains the environmental and/or social characteristics that the Portfolio promotes.

***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# CT (LUX) GLOBAL REAL ESTATE SECURITIES

## 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

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** CT (Lux) Global Real Estate Securities **Legal entity identifier:** 529900QD75LGEGT2C933 (the "**Portfolio**")

### 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:** ___ % | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments |
| ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy | ☐ 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 | ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy |
| | ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments 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?**

While prioritising the financial outcomes of the Portfolio, the Investment Manager promotes environmental and social characteristics by integrating the following responsible investment measures into the investment decision-making process:

- The Investment Manager invests at least 50% of the portfolio in companies that have strong Environmental, Social and Governance (ESG) materiality ratings (1-3 ratings) as assessed using the Columbia Threadneedle ESG Materiality Rating Model (ESG Materiality Rating Model). These ratings indicate how much exposure a company has to financially material ESG risks and opportunities, in areas such as energy efficiency and respect of human rights and workers' rights. A strong rating indicates that a company has less exposure to material ESG risks.

- The Investment Manager excludes companies that:

o derive revenue above set thresholds from certain industries and activities that do not promote environmental or social characteristics;

o in its opinion are in breach of accepted international standards and principles of governance such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

- In line with its engagement policy, the Investment Manager may engage with companies that have poorer ESG materiality ratings (4 or 5 ratings) to encourage improvement of their ESG practices over time on issues ranging from climate change to board independence and diversity.

The Portfolio also holds a minimum proportion (10%) of sustainable investments in companies that make a positive contribution to society and/or the environment.

It does not use a reference benchmark for the purpose of attaining the environmental and/or social characteristics.

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

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

The Portfolio has the following sustainability indicators, reflecting the measures explained above:

- The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG Materiality Rating (1-3 ratings). Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment..

- The Investment Manager invests at least 10% of the Portfolio's assets in sustainable investments.

- The Investment Manager excludes companies:

  - that it determines are in breach of accepted international standards, for example the UN Global Compact Principles; and

  - that derive revenue above set thresholds from certain industries and activities that are harmful to the environment and/or society.

The exclusion policy is adhered to with the application of strict pre-trade restrictions and is monitored on an ongoing basis.

As these indicators form the basis of the environmental and/or social characteristics promoted by the Portfolio, they are also the binding elements of the Portfolio's ESG strategy – further information on this is provided below.

- ***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 Investment Manager uses one or more of the criteria below to identify sustainable investments that contribute to an environmental or social objective:

- The contribution of a company to one or more of the 17 Sustainable Development Goals (SDGs) that have a social or environmental objective. This is measured using the proportion of a company's revenue streams that contribute positively to the targets of the SDGs. Where a company's revenues are at least 50% positively aligned, this indicates it generates the majority of its revenue from sustainable solutions.

- A qualitative assessment that a company offers sustainable solutions, where the Investment Manager's due diligence concludes and evidences that the contribution of a company's revenues aligned to the SDGs will increase over the medium term.

- A qualitative assessment and documented evidence that sustainability is a material business driver within a company's operations or business approach, which contributes to positive environmental or social outcomes.

- ***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?***

To ensure the sustainable investments do no significant harm (DNSH) to any environmental or social sustainable investment objective, the Investment Manager applies two additional checks:

- The exclusion of companies in the portfolio that (i) breach international standards and principles of governance (such as the UN Global Compact) (ii) are involved in controversial weapons and (iii) generate revenues over set thresholds in potentially harmful activities.

- The consideration of Principal Adverse Impact (PAI) indicators. The Investment Manager considers and monitors all mandatory PAIs and certain voluntary PAIs that are deemed particularly relevant to the Portfolio and where robust data is available. The Investment Manager has developed thresholds for each indicator to determine "significance", capturing how material an indicator is for an industry or sector, and what is considered particularly poor practice relating to that indicator.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

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, anti-corruption and anti-bribery matters.

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence.

This model identifies harm by using a quantitative threshold against a selection of PAI indicators. Companies which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams seek to satisfy that no significant harm has taken place through desk-based research or company engagement.

In addition, all equity investments are subject to the exclusion criteria, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG Materiality rating.

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

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess companies for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

*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 the EU 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

Yes. The Investment Manager proactively considers the PAIs of the investment decisions it makes for the Portfolio that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to sustainability indicators, and investments that breach these exclusions cannot be held by the Portfolio. The exclusions applied by the Portfolio relate to global norms, controversial weapons and thermal coal. In addition, the Investment Manager considers PAIs as part of research into, and engagement with, investee companies on environmental sustainability indicators relating to decarbonisation and biodiversity, and social factors such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on sustainability factors will be made available in the Annual Reports. Please see below for the full list of PAI indicators – detail on how these are taken into account can be found above under the section "How have the indicators for adverse impacts *on sustainability factors been taken into account?"*.

| | **Exclusions** | **Stewardship[128]** |
|---|---|---|
| 1.1. GHG emissions | | ✓ |
| 1.2. Carbon footprint | | ✓ |
| 1.3. GHG intensity of investee companies | | ✓ |
| 1.4. Exposure to companies active in the fossil fuel sector[129] | ✓ | ✓ |
| 1.5. Share of non-renewable energy consumption and production[130] | ✓ | ✓ |
| 1.6. Energy consumption intensity per high impact climate sector | | ✓ |
| 1.7. Activities negatively affecting biodiversity sensitive areas | | ✓ |
| 1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises | ✓ | ✓ |
| 1.13. Board gender diversity | | ✓ |

[128] PAIs are considered as part of engagement prioritisation.
[129] Exclusion relates to coal investments only.
[130] Exclusion relates to coal investments only.

| | | |
|---|---|---|
| 1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons) | ✓ | |
| 3.7. Incidents of discrimination | | ✓ |

☐ No

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

**What investment strategy does this financial product follow?**

The Portfolio's investment to strategy is to seek capital appreciation by investing principally, directly or indirectly, into equity securities of listed real estate companies. The Portfolio's exposure may be gained through both long and short positions. The Portfolio is actively managed in reference to the FTSE EPRA Nareit Developed NR Index. The index is broadly representative of the companies in which the Portfolio invests, and provides a suitable target benchmark against which Portfolio performance will be measured and evaluated over time. The index is not designed to specifically consider environmental or social characteristics. The Investment Manager has discretion to select investments with weightings different to the index, and that are not in the index, and the Portfolio may display significant divergence from the index.

The Investment Manager invests at least 50% of the portfolio in companies that have a strong ESG materiality rating (1-3 ratings), using the ESG Materiality Rating Model which is owned and developed by Columbia Threadneedle Investments. The model builds on the Sustainability Accounting Standards Board (SASB®) materiality framework and identifies the most financially material ESG risk and opportunity factors across a wide range of industries, based on subjective indicators.

Where sufficient data is available, the output of the model is a rating from 1 to 5. The ratings indicate how much exposure a company has to material ESG risks and opportunities in a particular industry i.e. risks that are likely to have a significant effect on a company's value such as human rights issues or energy efficiency. A rating of 1 indicates that a company has minimal exposure to material ESG risks and a rating of 5 indicates that a company has a higher exposure to such risks. These ESG materiality ratings are used by the Investment Manager to identify and assess potential material ESG risk and opportunity exposures in the securities held or considered for investment by the Portfolio, as part of its decision-making process.

The other portion of the portfolio may be invested in companies rated 4 or 5. To support and enhance the promotion of environmental and social characteristics, the Investment Manager may, in line with its engagement policy, seek proactive engagement with these companies to encourage improvements in their ESG practices, for example on issues relating to carbon emissions.

In addition, companies that (i) breach international standards and principles as determined by the Investment Manager or (ii) derive revenue above set thresholds from certain industries and activities that are harmful to the environment and/or society, are excluded from the Portfolio.

- ***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 following elements of the ESG investment strategy are binding on the Portfolio:

**6. Columbia Threadneedle ESG Materiality Rating**

The Investment Manager must invest at least 50% of the portfolio in companies that have a strong ESG materiality rating (1 to 3). In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

**7. Exclusions: revenue thresholds**

The Portfolio also excludes companies involved in the manufacture of controversial weapons and companies which

derive revenue above set thresholds from industries or activities that do not promote environmental or social characteristics. These exclusion criteria may be updated from time to time.

**8. Exclusions: breach of international standards**

The Portfolio excludes companies that the Investment Manager determines have breach accepted international standards and principles, such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

Additional information on the exclusion criteria is included in the Portfolio's Article 10 SFDR disclosure available at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section.

**9. Sustainable Investments**

The Portfolio commits to investing at least 10% of its assets in sustainable investments.

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

There is no commitment to reduce the scope of investments by a minimum rate prior to the application of the investment strategy.

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

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

**Pre-investment:** The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

**Post-investment:** Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. If any issues are flagged, the Investment Manager may engage with the company to better understand these as part of its review. However, where it is considered that the company no longer demonstrates good governance practices, the securities will be divested from the portfolio as soon as reasonably practicable.

The Investment Manager has developed a data-driven model which flags poor practices and controversies relating to the four pillars of good governance as outlined by SFDR to inform its assessment and monitoring of investee companies. The model covers:

5. Board structure: including board and key committee composition, diversity and inclusion, and commitments and policies.
6. Compensation: including pay-for-performance, use of equity, non-executive pay, and termination practices.
7. Employee relations: including compliance with labour standards, such as child labour, discrimination, and health and safety.
8. Tax quality: including tax reporting and corporate tax gap.

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

**Concerning the planned proportion of investments used to meet the environmental and/or social characteristics promoted by the Sub-Fund (#1 Aligned with E/S characteristics):**

Asset allocation describes the share of investments in specific assets.

The Investment Manager ensures that at least 90% of the total net assets of the Portfolio, excluding investments in ancillary liquid assets, bank deposits, money market instruments or money market funds for liquidity or treasury purposes, are assessed by the ESG Materiality Rating Model.

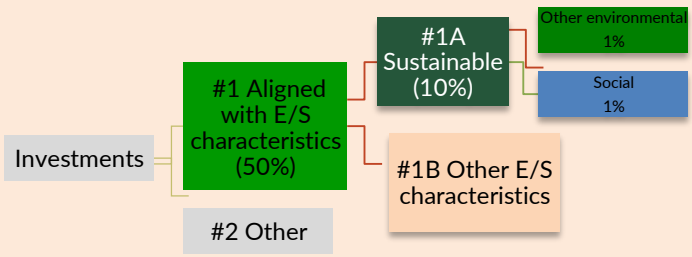
The minimum proportion of investments held in the Portfolio used to promote the environmental or social characteristics is 50% of its total net assets.

At least 50% of the investments held in the Portfolio will be in companies that have a strong ESG materiality rating (rating 1-3). Only investments in companies that have strong ESG materiality ratings are considered as aligned with the environmental and/or social characteristics promoted by the Portfolio. In exceptional circumstances, the Investment Manager may (i) assess companies that are not covered by its ESG Materiality Rating Model using its own research, (ii) rely on its own research to depart from a rating produced by its ESG Materiality Rating Model that it considers to be inaccurate, (iii) engage with companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, for improvement, or (iv) include companies that have either a low ESG Materiality rating, or are not covered by its ESG Materiality Rating Model, that qualify as sustainable investments, to achieve this 50% minimum commitment.

Whilst the Portfolio does not have a sustainable investment objective, it will hold a minimum proportion of 10% of its assets in sustainable investments with an environmental and/or social objective (category #1A sustainable).

For equity investments in category #1B, exclusions based on revenue thresholds and breach of international standards are applied to ensure environmental or social safeguards.

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.




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

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.

**Concerning the other investments (#2 Other):**

Other investments may include:

(i) ancillary liquid assets (i.e., bank deposit at sight) which are held for the purposes of liquidity management;

(ii) bank deposits, money market instruments or money market funds held for treasury purposes;

(iii) derivatives for hedging purposes; and

(iv) investments in companies that do not have a strong ESG materiality Rating (rating 4 or 5), or that are not covered by the ESG Materiality Rating Model, and such companies that do not qualify as sustainable investments. These companies do not meet the criteria for the promotion of environmental or social characteristics.

In light of the above, the planned maximum proportion of investments which are not used to contribute to the environmental and social characteristics promoted by the Portfolio is 50% of its total net assets.

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

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

There is no commitment to EU Taxonomy-aligned investments at the present time.

- ***Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[131]?***

☐ Yes:

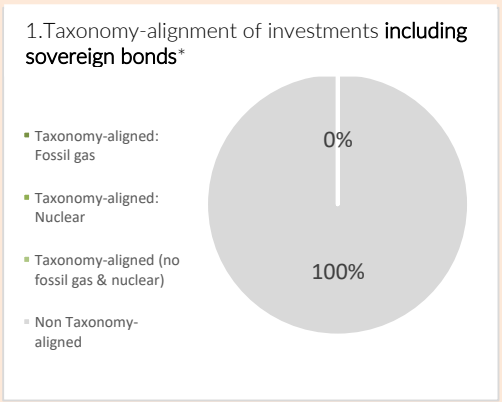
☐ In fossil gas ☐ In nuclear energy

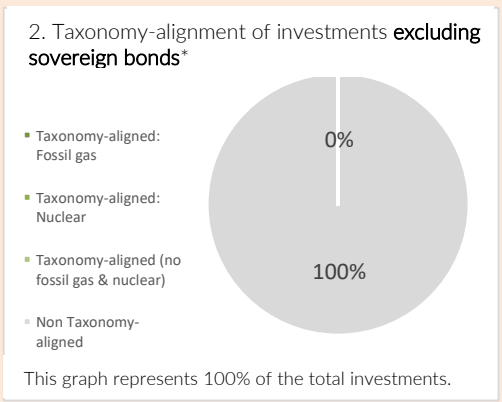
☒ No

Enabling activities directly enable other activities to make a substantial contribution to 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.

**The two graphs below show in green the minimum percentage of investments that are 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.**




**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?***

Not applicable.

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

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with a social objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

[131] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%. However, the minimum proportion held in the Portfolio may be higher than 1% and may vary depending on the investment opportunities available and the allocation to sustainable investments with an environmental objective. In any case, the Portfolio will hold a minimum proportion of 10% of sustainable investments overall with either an environmental or social objective.

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

All equity investments are subject to the exclusion policy, ensuring minimum environmental and social safeguards are in place even for companies that do not have a strong ESG materiality rating (4 or 5 rating) or that are not covered by the ESG Materiality Rating Model and therefore do not meet the criteria for the promotion of environmental or social characteristics.

Other investments include (i) ancillary liquid assets (i.e. bank deposit at sight) which are held for the purposes of liquidity management; (ii) bank deposits, money market instruments or money market funds held for treasury purposes; and (iii) derivatives for hedging purposes.

For ancillary liquid assets, bank deposits and derivatives, ESG considerations are integrated into the counterparty risk assessment.

**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?**

The Portfolio does not use the FTSE EPRA Nareit Developed NR Index to measure whether it attains the environmental and/or social characteristics that it promotes.

- ***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 product-specific information can be found on the website below by searching for your particular Portfolio and accessing the Portfolio's Key Documents by selecting your share class:

*https://www.columbiathreadneedle.lu/en/retl/our-funds/find-your-fund*

# GLOSSARY

| | |
|---|---|
| "**A Shares**" | Share Classes with the letter A as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Administration Agency, Domiciliary, Corporate and Paying Agency Agreement**" | the agreement, as amended from time to time, between the SICAV and the Domiciliary and Administrative Agent, as described in the section of this prospectus with the heading "Service Provider" under the sub-heading "Domiciliary and Administrative Agent"; |
| "**American Smaller Companies**" | companies with a market capitalisation typically ranging from $500 million to $10 billion at the time of purchase; |
| "**Articles**" | the articles of incorporation of the SICAV; |
| "**Asset Management Fee**" | the monthly fee payable by the SICAV to the Management Company under the terms of the Management Company Services Agreement at the annual rates set forth in Appendices C, D, E, F, G, H, I, J, K, L, N, O, P, Q, S, and T; |
| "**Auditor**" | PricewaterhouseCoopers Assurance, *société coopérative* or such other service provider as may be lawfully appointed to serve as auditor to the SICAV; |
| "**AUD**" | the legal currency of the Commonwealth of Australia; |
| "**B Shares**" | Share Classes with the letter B as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Base Currency**" | the currency in which a Portfolio is denominated; |
| "**Bond Connect**" | initiative for mutual bond market access between Hong Kong and Mainland China established by China Foreign Exchange Trade System & National Interbank Funding Centre, China Central Depository & Clearing Co., Ltd, Shanghai Clearing House, and Hong Kong Exchanges and Clearing Limited and Central Moneymarkets Unit; |
| "**Business Day**" | with respect to each Portfolio any day on which banks are open for normal banking business in Luxembourg and when the Directors believe that sufficient markets in which the Portfolio invested are also open and permit sufficient trading and liquidity to enable such Portfolio to be managed efficiently (a list of the Business Days is available on the website www.columbiathreadneedle.com); |
| "**CHF**" | the legal currency of the Swiss Confederation; |
| **"CNH"** | the offshore Chinese Renminbi, currency of the People's Republic of China; |
| "**Class**" | a class of Shares in the SICAV; |
| "**China–Hong Kong Stock Connect Programme**" | means the Shanghai-Hong Kong and Shenzhen-Hong Kong Stock Connect Programmes and other similar regulated securities trading and clearing linked Programmes which may be approved by the relevant authorities from time to time; |

| | |
|---|---|
| "**Class 1 Shares**" | Share Classes with the number 1 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Class 2 Shares**" | Share Classes with the number 2 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Class 3 Shares**" | Share Classes with the number 3 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Class 4 Shares**" | Share Classes with the number 4 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Class 8 Shares**" | Share Classes with the number 8 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Class 9 Shares**" | Share Classes with the number 9 as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Commitment Approach**" | a method for calculating leverage which takes into account the exposure of the Portfolio to derivative instruments with the exclusion of derivative instruments which are used for reducing risk (i.e. derivative instruments used for hedging and netting purposes). It is thus a leverage-calculation method which shows the "net" global exposure of a Portfolio to derivative instruments, taking into account the actual exposure of the Portfolio to such instruments; |
| "**Companies Law**" | the Luxembourg law of 10 August 1915 on Commercial Companies, as amended; |
| "**Continental Europe**" | all European countries ex-United Kingdom and ex-Ireland; |
| **"Contingent Convertible Bond"** or **"CoCo"** | debt instrument, issued by banks or financial institutions, which has a contingent capital feature. A contingent capital feature allows the bond to become equity (capital) upon a pre-specified triggering event. Triggering events include when the regulatory capital ratio of a bank reaches an agreed level, or the issue or issuer is subject to regulatory action or decision by the responsible regulator in the issuer's home market. The bondholder's claim can either be cancelled or partially written down in value (writedown feature), or become an equity claim (conversion feature). These instruments tend to be perpetual in nature and tend to have discretionary coupons. However, the contingent capital feature can be found on bullet maturity instruments; |
| "**CSSF**" | the Luxembourg *Commission de Surveillance du Secteur Financier*; |
| "**CSSF Circular 11/512**" | the circular issued by the CSSF on 30 May 2011 to all Luxembourg management companies in relation to (i) the presentation of the main regulatory changes in risk management following the publication of CSSF Regulation 10-4 and ESMA clarifications; (ii) further clarifications from the CSSF on risk management rules; and (iii) the definition of the content and format of the risk management process to be communicated to the CSSF; |
| "**CSSF Circular 08/356**" | the circular issued by the CSSF on 4 June 2008 to all Luxembourg |

| | |
|---|---|
| | UCIs and those who act in relation to their operation and outlining rules applicable to UCIs when they employ certain techniques and instruments relating to transferable securities and Money Market Instruments; |
| "**CSSF Regulation 10-4**" | the regulation issued by the CSSF on 24 December 2010 transposing Commission Directive 2010/43/EU of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards organisational requirements, conflicts of interest, conduct of business, risk management and the content of the agreement between a depositary and a management company; |
| "**D Shares**" | Share Classes with the letter D as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Depositary**" | State Street Bank International GmbH, Luxembourg Branch or such other service provider as may be lawfully appointed to serve as depositary to the SICAV; |
| "**Depositary Agreement**" | the agreement, as amended from time to time, between the SICAV and the Depositary as described in the section of the prospectus with the heading "Service Providers" under the sub-heading "Depositary"; |
| "**DKK**" | the legal currency of Denmark; |
| "**Domiciliary and Administrative Agent**" | State Street Bank International GmbH, Luxembourg Branch or such other service provider as may be lawfully appointed to serve as domiciliary and administrative agent to the SICAV; |
| "**Directors**" | the board of directors from time to time of the SICAV including any duly authorised committee thereof; |
| "**Dow Jones Euro Stoxx 50**" | a leading Blue-chip index whose stated objective is to provide a representation of supersector leaders in the Euro Area. The index covers 50 stocks from 12 Euro Area countries: Austria, Belgium, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal and Spain; |
| "**Eligible Investor**" | an existing or new investor of the SICAV that is eligible at the SICAV's discretion to invest in X Shares or Class 4 Shares either (i) upon entering into an agreement with the Management Company or Threadneedle Portfolio Services Hong Kong Limited on behalf of the SICAV and fulfilling the eligibility conditions set by the SICAV from time to time or (ii) other UCIs or UCITS which have the same Management Company or have the same ultimate owner as the Management Company and therefore will not be subject to an asset management fee, or subscription fee; |
| "**Eligible Market**" | a regulated market in an Eligible State which operates regularly and is recognised and open to the public; |
| "**Eligible State**" | any member state of the OECD and all other countries of the American continents, Europe, Asia, Africa and Oceania; |
| "**Eligible Transferable Securities**" | (i) transferable securities admitted to official listing on a stock exchange in an Eligible State; and/or<br><br>(ii) transferable securities dealt in on another Eligible Market; |

| | |
|---|---|
| | and/or<br><br>(iii) recently issued transferable securities, provided that the terms of issue include an undertaking that application will be made for admission to official listing on a stock exchange in an Eligible State or on an Eligible Market and such admission is achieved within a year of the issue; |
| "**Emerging Market Countries**" | any country that is not represented in the MSCI World Index will be considered as an Emerging Market Country; |
| "**EMIR**" | Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories; |
| "**EU**" | current and any future member countries of the European Union; |
| "**Euro**" or "**€**" or "**EUR**" | the legal currency of the countries participating in the European Economic and Monetary Union; |
| "**Euro Area**" | the collective group of countries whose legal currency is the Euro; |
| "**Europe**" | all countries that are members of the European Economic Area, Switzerland and the UK. The term "European" shall be construed accordingly; |
| **"ESMA"** | the European Securities and Markets Authority; |
| **"ESMA Guidelines"** | the ESMA Guidelines on ETFs and other UCITS issues (Ref. ESMA/2012/832EN) as transposed into Luxembourg legislation by CSSF circular 13/559 issued by the CSSF on 18 February 2013; |
| "**European Smaller Companies**" | European companies either headquartered in Europe or exercising a predominant part of their activities in Europe, that at the time of purchase, are no larger by free-float adjusted market capitalisation than the largest constituent of the MSCI Europe Small Cap Index. This definition does not apply to the European Smaller Companies Portfolio. Market capitalisation refers to the total value of a company's shares. The free-float adjusted method of calculating market capitalisation includes only shares available for purchase in public equity markets so excludes, for example, shares held privately, by the company itself and its affiliates or by governments; |
| "**G-7**" | Canada, France, Germany, the United Kingdom, Italy, Japan and the United States; |
| "**GBP**" or "**Sterling**" | the legal currency of the United Kingdom; |
| **"Global Smaller Companies"** | Companies globally that are no larger by market capitalisation than the largest constituent of the MSCI World Small Cap Index; |
| "**Group of Companies**" | companies belonging to the same body of undertakings and which must draw up consolidated accounts in accordance with Council Directive 83/349/EEC of 13 June 1983 on consolidated accounts and according to recognised international accounting rules or would be required to do so if they were located in the EU; |
| "**Hedged Shares**" | Shares that aim to hedge the currency risk between a Portfolio's base currency and the currency of denomination of such Shares. The hedging will be implemented by using currency derivatives. |

| | |
|---|---|
| | Hedged Shares may be made available in all Portfolios and in various currencies at the discretion of the Directors; confirmation of the Portfolios and currencies in which Hedged Shares are available may be obtained from the Management Company; |
| **"HKD"** | the legal currency of Hong Kong; |
| "**I Shares**" | Share Classes with the letter I as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Institutional Investors**" | Institutional Investors, as defined by guidelines or recommendations issued by the Regulatory Authority from time to time; |
| "**Institutional Share Classes**" | Classes which are only available for subscription and holding by Institutional Investors; |
| "**Investment Grade**" | for Portfolios other than the Global Corporate Bond, Credit Opportunities, and Enhanced Commodities Portfolios, securities with an average rating of at least BBB- (or equivalent). The average rating is based on a simple linear methodology using ratings from S&P, Moody's or Fitch. If only two ratings are available, the simple average of those ratings shall be used. If only one rating is available, the security must be rated as investment grade by that agency. In the event that the security is unrated, it is believed to be of equivalent quality in the opinion of the Management Company or of the relevant Investment Manager on the basis of its internal rating system. For the Global Corporate Bond and Credit Opportunities Portfolios, securities rated at least BBB- (or equivalent) by S&P, Moody's or Fitch, using the following rules: (i) if all three agencies rate the relevant security, the middle rating; (ii) if two agencies rate the securities, the lower rating will be used; (iii) if one agency rates the security, it must be rated as investment grade by that agency or (iv) are unrated and believed to be of equivalent quality in the opinion of the Management Company or of the relevant Investment Manager on the basis of its internal rating system. For the Enhanced Commodities Portfolio, securities rated at least BBB- / Baa3 by S&P or Moody's. Where the ratings differ, the lower of the ratings shall apply; |
| "**Investment Manager**" | a service provider appointed under the terms of an agreement with the Management Company to provide investment management or advisory services with respect to one or more portfolios, as set out in the section "Investment Management Arrangements"; |
| "**Japanese Yen**" or "**JPY**" | the legal currency of Japan; |
| **"L Shares"** | Share Classes with the letter L as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Latin America**" | all countries in the Americas except the United States and Canada; |
| "**2010 Law**" | the Luxembourg law of 17 December 2010 relating to UCI, as amended; |
| "**LIBOR**" | the London Interbank Offered Rate, the daily reference rate based on the interest rates at which banks borrow unsecured funds from |

| | |
|---|---|
| | other banks in the London wholesale money market (or interbank lending market); |
| "**M Shares**" | Share Classes with the letter M as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Management Company**" | Threadneedle Management Luxembourg S.A., the designated management company of the SICAV; |
| "**Management Company Services Agreement**" | the agreement made between the SICAV and the Management Company dated as of 31 October 2005, as may be amended from time to time; |
| "**Member State**" | a member state of the European Union or of the European Economic Area ("EEA"); |
| "**MiFID II/ MiFIR**" | Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and Regulation 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments; |
| "**Money Market Instruments**" | instruments normally dealt in on the money market which are liquid and have a value which can be accurately determined at any time; |
| "**Moody's**" | Moody's Investors Service; |
| "**MSCI**" | Morgan Stanley Capital International Index; |
| "**MUICP**" | an aggregate index covering the Euro Area. The index is calculated by Eurostat using the harmonised indices of consumer prices ("HICP") determined by each of the countries belonging to the Euro Area in accordance with the methodology for compiling consumer prices indices set out in particular in Regulation 2494/95/EC and Regulation 1114/2010/EU; |
| "**N Shares**" | Share Classes with the letter N as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Net Asset Value**" | the net asset value of each Class within each Portfolio, as described in Section "Net Asset Value Determination"; |
| "**NOK**" | the legal currency of Norway; |
| "**North America**" | the United States and Canada; |
| "**NRSRO**" | a nationally recognised statistical rating organisation; |
| "**OECD**" | the members of the Organisation for Economic Co-operation and Development; |
| "**Other Regulated Market**" | means a market which is regulated, operates regularly and is recognised and open to the public, namely a market (i) that meets the following cumulative criteria: liquidity; multilateral order matching (general matching of bid and ask prices in order to establish a single price); transparency (the circulation of complete information in order to give clients the possibility of tracking trades, thereby ensuring that their orders are executed on current conditions); (ii) on which the securities are dealt in at a certain fixed frequency; (iii) which is recognised by a State or by a public |

| | |
|---|---|
| | authority which has been delegated by that State or by another entity which is recognised by that State or by that public authority such as a professional association; and (iv) on which the securities dealt are accessible to the public; |
| "**Other State**" | any State of Europe which is not a Member State, any State of America, Africa, Asia and Oceania; |
| "**Package Retail Investment and Insurance Products**" or "**PRIIPs KID** | information document for packaged retail and insurance-based investment products in accordance with the provision of the Regulation (EU) No 1286/2014 of 26 November 2014, as amended, or in accordance with an equivalent requirement in the jurisdictions in which the shares" of the SICAV are offered ("**PRIIPs KID**", former Key Investor Information Document). Investors can obtain the latest PRIIPs KID on the website www.columbiathreadneedle.com; |
| "**PRC**" | the People's Republic of China; |
| "**Portfolios**" | segregated portfolios of assets of the SICAV, each represented by one or more Classes and managed in accordance with a specified investment objective and policy; |
| "**principally**" | each time that the word "principally" is used in the description of the investment objective of a Portfolio, this means at least two thirds of the assets of the relevant Portfolio are directly invested in the currency, the country, the type of security or the other material element in relation to which the term "principally" is used in description of the relevant Portfolio's investment objective; |
| "**REIT**" | Real Estate Investment Trust; |
| "**Redemption Price**" | the redemption price per Share of each Class in respect of each Portfolio, calculated in accordance with the methodology set out under the "Redemption of Shares" section; |
| "**Registrar and Transfer Agency Agreement**" | the agreement made between the SICAV and the Registrar and Transfer Agent dated 31 October 2011; |
| "**Registrar and Transfer Agent**" | SS&C Administration Services Luxembourg S.A. or such other service provider as may be lawfully appointed to serve as registrar and transfer agent to the SICAV; |
| "**Regulated Market**" | a regulated market as defined in the Parliament and Council Directive 2004/39/EC of 21 April 2004 on markets in financial instruments as amended ("Directive 2004/39/EC") namely a multilateral system operated and/or managed by a market operator, which brings together or facilitates the bringing together of multiple third party buying and selling interests in financial instruments – in the system and in accordance with its non-discretionary rules – in a way that results in a contract, in respect of the financial instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly and in accordance with the provisions of Title III of Directive 2004/39/EC. An updated list of Regulated Markets is available at: https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_upreg#; |
| "**Regulatory Authority**" | the Luxembourg authority or its successor in charge of the supervision of UCI in the Grand Duchy of Luxembourg; |

| | |
|---|---|
| **"RESA"** | *Recueil Electronique des Sociétés et Associations* of the Grand Duchy of Luxembourg |
| "**S Shares**" | Share Classes with the letter S as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**secondarily**" | each time that the word "secondarily" is used in the description of the investment objective of a Portfolio, this means that no more than one third of the assets of the relevant Portfolio are invested in the currency, the country, the type of security or the other material element in relation to which the term "secondarily" is used in the description of the relevant Portfolio's investment objective; |
| "**Securities Act**" | the U.S. Securities Act of 1933, as amended; |
| "**SEK**" | the legal currency of Sweden; |
| "**Shareholders**" | holders of Shares in the SICAV, as recorded in the books of the SICAV on file with the Registrar and Transfer Agent; |
| "**Shares**" | shares of the SICAV of no par value each designated into different Classes with reference to the Portfolios of the SICAV; |
| "**SICAV**" | Columbia Threadneedle (Lux) I, a *société d'investissement à capital variable* (an open-ended investment fund of the corporate type); |
| **"Social Rating Methodology"** | a proprietary categorisation and rating model developed by the Investment Manager which analyses the social characteristics of a potential investment as described in the investment policy of the European Social Bond Portfolio; |
| "**Subscription Price**" | the subscription price per Share of each Class in respect of each Portfolio, calculated in accordance with the methodology set out under the "Purchase of Shares" section; |
| "**S&P**" | Standard and Poor's Corporation; |
| "**S&P 500 Index**" | the index compiled by S&P consisting of 500 stocks chosen for market size, liquidity and industry group representation and being a market-value weighted index, with each stock's weight in the index being proportionate to its market value; |
| "**SGD**" | the legal currency of Singapore; |
| "**Sum of Notionals**" | a method for calculating leverage which takes into account the absolute value of notionals of derivative instruments without taking into account the fact that some derivatives are actually reducing risk. If the Portfolio owns a long derivative and a short derivative with the same risk exposure, the sum of the notionals approach will add up both notionals (whilst the commitment approach will show zero exposure as there is no incremental risk), resulting in a higher level of leverage than if the calculation had been made on the basis of the commitment approach. The sum of the notionals approach is thus a leverage-calculation method which shows the "gross" notional amounts of a Portfolio to derivative instruments, taking into account the notionals to all derivatives, independently from the reasons of the exposure of the Portfolio thereto; |
| **"T Shares"** | Share Classes with the letter T as the first character of their denomination, with features as described in Section "Share |

| | |
|---|---|
| | Classes”; |
| “**Transferable Securities**” | - shares and other securities equivalent to shares;<br>- bonds and other debt instruments;<br>- any other negotiable securities which carry the right to acquire any such transferable securities by subscription or exchange with the exclusion of techniques and instruments;<br>- loan participations; |
| “**UCI**” | an undertaking for collective investment as defined by Luxembourg law; |
| “**UCITS**” | an undertaking for collective investment in Transferable Securities under Article 1 (2) of the UCITS Directive; |
| “**UCITS Directive**” | Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities as may be amended; |
| “**UK**” or “**United Kingdom**” | the United Kingdom of Great Britain and Northern Ireland, its territories and possessions; |
| “**US**” or “**United States**” | the United States of America, its territories and possessions, any State of the United States and the District of Columbia; |
| “**United States Person**” | a person as defined in Regulation S of the Securities Act who is not a “non-United States Person” within the meaning of Rule 4.7 issued by the U.S. Commodity Futures Exchange under the U.S. Commodity Exchange Act and thus shall include but not be limited to, (i) any natural person resident in the United States; (ii) any partnership or corporation organised or incorporated under the laws of the United States; (iii) any estate of which any executor or administrator is a U.S. person; (iv) any trust of which any trustee is a U.S. person; (v) any agency or branch of a foreign entity located in the United States; (vi) any non-discretionary account or similar account (other than an estate or trust) held by a dealer, or other fiduciary for the benefit or account of a U.S. person; (vii) any discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary organised, incorporated, or (if an individual) resident in the United States; and (viii) any partnership or corporation if: (A) organised or incorporated under the laws of any foreign jurisdiction; and (B) formed by a U.S. person principally for the purpose of investing in securities not registered under the Securities Act, unless it is organised or incorporated, and owned, by accredited investors (as defined in Rule 501(a) under the Securities Act) who are not natural persons, estates or trusts; and (i) an entity organised outside the United States principally for passive investment, such as a commodity pool, investment company or other similar entity (other than a pension plan for the employees, officers or principals of an entity organised and with its principal business in the United States): (a) in which U.S. persons hold units of participation representing in the aggregate 10% or more of the beneficial interest in the entity; or (b) which has as a principal purpose the facilitating of investment by a U.S. person in a commodity pool with respect to which the operator is exempt from certain requirements of Part 4 of the regulations of the U.S. Commodity Futures Trading Commission by virtue of its participants being non-U.S. persons; but shall not include: (I.) any discretionary account or similar account (other than an estate or trust) held for the benefit or account of a non-U.S. |

| | |
|---|---|
| | Person by a dealer or other professional fiduciary organised, incorporated, or (if an individual) resident in the United States or (II.) any estate of which any professional fiduciary acting as executor or administrator is a U.S. person if an executor or administrator of the estate who is not a U.S. person has sole or shared investment discretion with respect to the assets of the estate and the estate is governed by foreign law; |
| "**U.S. Dollar**" or "**US$**" or "**USD**" | the legal currency of the United States; |
| "**Valuation Date**" | any Business Day; |
| "**VaR**" | Value at risk; |
| "**W Shares**" | Share Classes with the letter W or P as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**X Shares**" | Share Classes with the letter X as the first character of their denomination, with features as described in Section "Share Classes"; |
| "**Z Shares**" | Share Classes with the letter Z as the first character of their denomination, with features as described in Section "Share Classes". |