

## **Sustainability-related Product Disclosure**

#### Information

Product Name: **Thematics AAA European Selection** Legal Entity Identifier: **969500QXNXXS3MAN6B46** 

SFDR Classification: Article 8

### (a) Summary

Thematics AAA European Selection aims to achieve a performance, over the recommended long-term investment period of at least 5 years, superior to that of the European equity markets by taking advantage of the dynamics of European stocks linked to several themes managed by the manager such as artificial intelligence and robotics, security, the subscription economy, water and well-being. All the securities making up the portfolio systematically include environmental, social and governance ("ESG") considerations.

The Fund promotes environmental or social characteristics, but does not pursue a sustainable investment objective. However, it may partially invest in assets with a sustainable objective as defined by the classification of the European Union

## (b) No sustainable investment objective

### Does this financial product have a sustainable investment objective?

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

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?

Not applicable

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?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

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

Not applicable

### (c) Environmental or social characteristics of the financial product

The Fund invests in european companies exposed to the global structural trend around water, safety, wellness, artificial intelligence and robotics, and subscription economy. It aims to promote ESG through selecting companies exposed to the scope of the themes, avoiding companies exposed to controversial activities, non-compliant companies to global sustainability standards and norms, exposed to high to severe ESG controversies, maintaining better ESG score than the Investable Universe, and actively voting and engaging with investee companies. No reference benchmark has been designated for the purpose of attaining the E/S characteristics promoted by the Fund.

### (d) Investment strategy

#### What investment strategy does this financial product follow?

1. Sustainable or positive thematic screening

The Investment Managers select securities whose solutions both:

- contribute to the theme's sub-segments that in turn contribute to 1 or more of the following sustainability targets: water usage efficiency, sustainable water withdrawals, water treatment technologies, advanced water management technologies; hazardous waste management, pollution monitoring; water supply and water delivery infrastructure; resource use optimisation, climate mitigation and resilience, health and safety, improved healthcare quality and access, and smart home and cities; food and health safety, data privacy and consumer protection, improved and safe access to digital economy, safe mobility and transport systems, personal and industrial safety systems, and other advanced security systems; Improve access to products and services for physical and mental health and well-being, improve access to products and services for basic human needs including food, healthcare and education, and enable decent and meaningful work; responsible and sustainable consumption, resource-efficient circular economy, climate mitigation and resilience, and improved access to education and other basic services.
- meet the materiality or leadership requirement of the theme.
  - Materiality means: the issuer must at least generate 20% of the revenue and/or profits from the relevant products as of today or in the 3 to 5 years.
  - Leadership requirements: the issuer's products must be, in the opinion of the Investment Managers, leader in the industry, innovative or with the potential to become disruptive.

### 2. activity-based exclusion

The Investment Managers further screen the Investable Universe by excluding securities that have exposure (greater than 5% in revenue) to harmful, controversial activities. These include but not limited to coal, conventional oil and gas, shale oil, tar sands, Arctic drilling and exploration, conventional and non-conventional weapons, and tobacco.

#### 3. behaviour-based exclusion

In addition, the Investment Managers systematically exclude securities whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour, in particular on environmental protection, human rights, labour rights, and business ethics. These standards include the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, and the International Labour Conventions. The screening is informed by third-party data.

- 4. In the final portfolio construction phase, the Investment Managers carry out an ESG analyses using its proprietary ESG assessment guided by established materiality frameworks, such as but not limited to, Sustainability Accounting Standards Board (SASB) and Global Reporting Initiative (GRI). The Investment Managers score individual companies across the 11 different material environmental, social, and governance indicators drawing from a range of resources, including desktop research, company engagementfrom at least two third-party rating agencies (ISS and Sustainalytics). The total ESG score carries an equal weight (25%) as other investment criteria (i.e. Quality, Trading Risk and Management) and will impact the security's inclusion and final weight of the investment. The review of the ESG criteria permanently covers at least 90% of the Fund's net assets.
- 5. In order to measure the effectiveness of the ESG approach implemented, the Investment Manager ensures that the Fund will will have a better ESG rating than its Investable Universe (measured as the rolling 3 months average of the weekly score), after eliminating at least 20% of the worst-rated securities of the latter, based on external third-party ESG risk scoring.
- 6. Companies exposed to high and/or severe level controversies are excluded. If the company is already in the portfolio and becomes exposed to high and/or severe ESG controversies, the Investment Managers will cap the position at 2% The total volume of capped securities cannot be more than 5. Further, targeted engagement with the company is initiated. The cap will be lifted if sufficient performance improvement is demonstrated within 6 months. Investment Managers will exit the investment if not enough progress is made.
- 7. Thematics AM intends to exercise 100% of the voting rights on the issuers of the securities held in the portfolios managed, and in compliance with its sustainability principled-based voting policy.
- 8. Thematics AM intends to engage with a certain percentage of issuers each year.

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?

- 1. Percentage of Fund's asset under management that contributes to the theme and meet the materiality or leadership criteria is 100% excluding cash.
- 2. Percentage of the Fund's assets under management of issuers generating more than 5% of revenue from harmful and/or controversial activities is 0%

- 3. Percentage of the Fund's assets under management of issuers whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour is 0%
- 4. Percentage of the Fund's assets under management that are subject to ESG analysis by Investment Managers is 100%.
- 5. Portfolio ESG score's outperforms the ESG score of the Investable Universe (measured as the rolling 3 months average of the weekly score), after eliminating at least 20% of the worst-rated securities of the latter, based on external third-party ESG risk scoring.

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- 6.1. Percentage of the Fund's assets under management of newly invested issuers that has already high and/or severe ESG controversies at the time of investment is 0%
- 6.2. Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and are capped to 2% is maximum 5.
- 6.3. Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and, within a 6 month time frame:
  - are not engaged or,
  - are engaged but do not demonstrate sufficient performance improvement.

Is 0.

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- 7.1. Total percentage of submitted votes is at least 95%.
- 7.2. Percentage of submitted votes according to the sustainability-principled policy is at least 95%.
- 8. Percentage of AUM covered by targetted engagement is at least 5%.

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

The committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy is 20%.

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

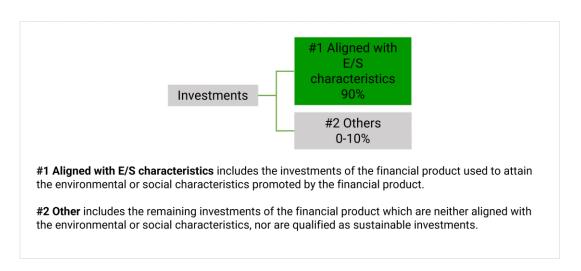
Good governance is promoted across the investment process through the following: behaviour-based exclusion, which is an assessment of company's governance and performance on various governance indicators; ESG assessment, which include material governance indicators such as board quality, business ethics, remuneration and shareholder protection; and voting and engagement on targeted governance issues, including sustainability management and transparency.

### (e) Proportion of investments

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

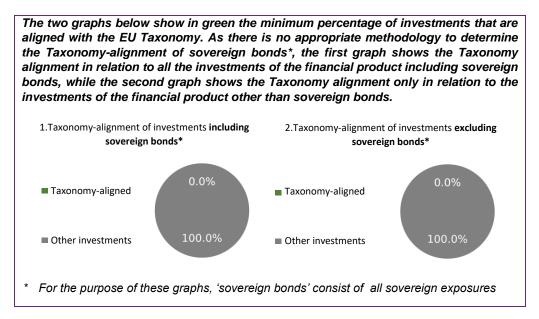
The Fund is expected to invest at least 90% of its NAV in companies that qualify as aligned with E/S characteristics (#1).

The Fund is expected to invest up to 10% of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).



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

Not applicable



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

The Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. As a consequence, the Fund does not commit to a minimum share of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

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

As the Fund does not commit to invest any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the Taxonomy Regulation is therefore also set at 0%.

## What investments are included under "#2 others"/"#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. As a consequence, the Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

#### (f) Monitoring of environmental or social characteristic

The Fund plan to report on the following in an annual basis:

- Percentage of Fund's asset under management that contributes to the theme.
- Percentage of the Fund's assets under management of issuers generating more than 5% of revenue from harmful and/or controversial activities
  - Percentage of the Fund's assets under management of issuers whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour
  - Percentage of the Fund's assets under management that are subject to ESG analysis by Investment Managers.
  - Portfolio's ESG score vs Investable Universe's score (measured as the rolling 3 months average of the weekly score), after eliminating at least 20% of the worst-rated securities of the latter.
  - Percentage of the Fund's assets under management of newly invested issuers that has already high and/or severe ESG controversies at the time of investment.
  - Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and within a 6 month time frame:
    - are not engaged or,
    - are engaged but do not demonstrate sufficient performance improvement.
  - Total percentage of submitted votes.
  - Percentage of submitted votes according to the sustainability-principled policy.
  - Percentage of AUM covered by targetted engagement.

The Fund plans to report on the following:

- Percentage of Fund's asset under management that contributes to the theme.
  - Ongoing monitoring by the Portfolio managers and the ESG team.
  - Annual monitoring by the ESG Team
  - Annual reporting.
- Percentage of the Fund's assets under management of issuers generating more than 5% of revenue from harmful and/or controversial activities
  - Exclusion list is hard-coded in pre-trade mode into the trading platform and updated periodically.
  - Annual reporting.

- Percentage of the Fund's assets under management of issuers whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour
  - ➤ Exclusion list is hard-coded in pre-trade mode into the trading platform and updated periodically.
  - Annual reporting.
- Percentage of the Fund's assets under management that are subject to ESG analysis by Investment Managers.
  - Ongoing monitoring by the Portfolio managers
  - Annual monitoring by the ESG Team
  - Annual reporting.
- Portfolio's ESG score vs Investable Universe's score (measured as the rolling 3 months average of the weekly score), after eliminating at least 20% of the worst-rated securities of the latter, and covering at least 90% of the portfolio
  - Weekly monitoring by the Risk Team
  - Annual reporting
- Percentage of the Fund's assets under management of newly invested issuers that has already high and/or severe ESG controversies at the time of investment.
  - Ongoing monitoring by the Portfolio managers.
  - ➤ Bi-monthly monitoring by the ESG Team.
  - Annual reporting
- Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and within a 6-month time frame:
  - are not engaged or,
  - are engaged but do not demonstrate sufficient performance improvement.
    - Ongoing monitoring by the Portfolio managers.
    - > Bi-monthly monitoring by the ESG Team
    - Annual reporting
- Total percentage of submitted votes.
- Percentage of submitted votes according to the sustainability-principled policy.
  - Task delegated to a service provider
  - Annual monitoring by the ESG Team
  - Annual reporting.
- Percentage of AUM covered by targeted engagement.
  - Ongoing monitoring by the Portfolio managers and the ESG team.
  - Annual monitoring by the ESG Team
  - Annual reporting.

## (g) Methodologies

1. Positive thematic screening

The Investment Managers select securities whose solutions both:

- contribute to the theme via the theme's sub-segments that in turn contribute to 1 or more of the sustainability targets stated in the prospectus.
- meet the materiality or leadership requirement of the theme.
- Materiality means: the issuer must at least generate 20% of the revenue and/or profits from the relevant products as of today or in the 3 to 5 years.
- Leadership requirements: the issuer's products must be, in the opinion of the Investment Managers, leader in the industry, innovative or with the potential to become disruptive.

Based on the portfolio as of 31 Dec of each reporting year:

- Percentage of AUM invested per subsegment and the subsegment's corresponding sustainability thematic target.
- The Materiality and Leadership percent distribution of the subsegment: % of Leaders, % of Materially exposed (20-90% of revenue, % of Pureplay (90-100% revenue).

### 2. Activity-based exclusion

The Investment Managers further screen the Investable Universe by excluding securities that have exposure (greater than 5% in revenue) to harmful, controversial activities. These include but not limited to coal, conventional oil and gas, shale oil, tar sands, Arctic drilling and exploration, conventional and non-conventional weapons, and tobacco.

➤ Percentage of the Fund's assets under management of issuers generating more than 5% of revenue from harmful and/or controversial activities, based on the portfolio as of 31 December of each reporting year.

#### 3. Behaviour-based exclusion

In addition, the Investment Managers systematically exclude securities whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour, in particular on environmental protection, human rights, labour rights, and business ethics. These standards include the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, and the International Labour Conventions. The screening is informed by third-party data.

- Percentage of the Fund's assets under management of issuers whose behaviour and overall performance are considered non-compliant to established global sustainability norms and principles governing corporate behaviour, based on the portfolio as of 31 Dec of each reporting year
- 4. In the final portfolio construction phase, the Investment Managers carry out an ESG analyses using its proprietary ESG assessment guided by established materiality frameworks, such as but not limited to, Sustainability Accounting Standards Board (SASB) and Global Reporting Initiative (GRI). The Investment Managers score individual companies across the 11 different material environmental, social, and governance indicators drawing from a range of resources, including desktop research, company engagement from at least two third-party rating agencies (ISS and Sustainalytics). The total ESG score

carries an equal weight (25%) as other investment criteria (i.e. Quality, Trading Risk and Management) and will impact the security's inclusion and final weight of the investment.

- ➤ Indication of % of portfolio subjected to internal ESG scoring based on the portfolio as of 31 December of each reporting year.
- 5. In order to measure the effectiveness of the ESG approach implemented, the Investment Manager ensures that the Fund will have a better ESG rating than its Investable Universe (measured as the rolling 3 months average of the weekly score), after eliminating at least 20% of the worst-rated securities of the latter, based on external third-party ESG risk scoring. The review of the ESG criteria permanently covers at least 90% of the Fund's net assets.
  - Number of active breaches which occurred during the year and their rational.
- 6. Companies exposed to high and/or severe level controversies are excluded. If the company is already in the portfolio and becomes exposed to high and/or severe ESG controversies, the Investment Managers will cap the position at 2% The total volume of capped securities cannot be more than 5. Further, targeted engagement with the company is initiated. The cap will be lifted if sufficient performance improvement is demonstrated within 6 months. Investment Managers will exit the investment if not enough progress is made.
  - Throughout the year: percentage of the Fund's assets under management of newly invested issuers that has already high and/or severe ESG controversies at the time of investment; Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and are capped to 2%; Number of already invested issuers that becomes exposed to high and/or severe ESG controversies and, within a 6-month time frame:
    - are not engaged or,
    - are engaged but do not demonstrate sufficient performance improvement.
- 7. Thematics AM intends to exercise 100% of the voting rights on the issuers of the securities held in the portfolios managed, and in compliance with its sustainability principled-based voting policy.
  - > Throughout the year: Total percentage of submitted votes; Percentage of submitted votes according to the sustainability-principled policy.
- 9. Thematics AM intends to engage with a certain percentage of issuers each year.
  - Percentage of AUM covered by targeted engagement based on the portfolio as of 31 December of each reporting year.

### (h) Data sources and processing

Sources Processing:

- Positive screening: internal research, third-party data, brokers sell-side research; Portfolio Managers estimate the thematic alignment based on internal thematic scope and boundary.
- Negative screening: internal research, third-party data, external databases; ESG Team builds the list using the sources listed, and is reviewed and validated by the Responsible Investment Committee.

- Controversy: Third-party data; PMs have access to news and monitors exposure to potential ESG controversies.
- ESG Scoring: Third-party data (CDP, internal research, company engagement) Portfolio Managers conduct their own ESG scoring, using the multiple third-party data to inform their assessment.
- Voting: Third-party service, Internal research; PMs receive alerts on upcoming proxy meeting and voting recommendations, they specifically review resolutions where the recommendation by the Third-party proxy voting service is Against the Management.
- Engagement: Internal research.
- For some data sets, i.e. GHG emission, we are able to ascertain the percentage of reported vs estimated data. For most of the data sets, i.e. revenue from products or services, such data is unavailable.

## (i) Limitations to methodologies and data

- 1. Coverage: Not all companies are covered by third-party data providers.
- 2. Frequency of update: Data providers may not necessarily update the companies in the most timely manner.
- 3. Third-party revenue data is both disclosed and estimated.
- 4. Analysis is partly based on data provided by investee companies and is therefore dependent on the quality of this information which can be very heterogeneous.
- 5. Mitigation measure: final ESG scores are based on PMs own conviction, multiple sources, including third-party and their own desktop research.

### (j) Due diligence

Due diligence is performed by the Portfolio Managers, supported by the ESG Team. The approaches used by Thematics AM are integrated into the end-to-end investment process, alongside traditional financial analyses.

In the Define Phase, PMs conduct various checks to ensure the security selection meets the following: positive screening criteria, product-based exclusion thresholds, and norms-based assessment.

In the Select Phase, PMs carry out the ESG scoring using Thematics AM's proprietary ESG risk scoring framework. In the Act Phase post investment, the PMs review the proxy voting resolutions, with particular focus on items where third-sustainability voting recommendation is to vote Against the management, as well as carry out ESG-focused engagements, with the support of the ESG Team.

Compliance and Internal Control Controls – annually:

- ESG management system: ESG framework organization; human and technical resources implemented.
- ESG methodology: data, ESG criteria, consideration of climate risk, rating of issuers, selection of securities, exclusion of securities, engagement policy, external suppliers use.
- A priori and a posteriori information provided to investors on the implementation of the ESG/voting policy,
- Checking the configuration of the constraints stipulated in the ESG management process,

- Monitoring of breaches, and implementation of an escalation procedure until the actual resolution.
- Voting policy controls: Internal organization and tools, annual report on the exercise of voting rights.

The ESG process is also subject to pluri-annual internal audit.

## (k) Engagement policies

Is engagement part of the environmental or social investment strategy?

☐ Yes ☐ No

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

The Engagement Policy and Engagement Report can be accessed here : <a href="https://www.thematics-am.com/en-FR/being-responsible/reports-and-publications">https://www.thematics-am.com/en-FR/being-responsible/reports-and-publications</a>

## (I) Designated reference benchmark (if applicable)

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

## (m) Additional Information

Thematics SFDR documentation:

 $\underline{\text{https://www.im.natixis.com/fr/investment-managers-and-capabilities/thematics-asset-management}}$ 

Additional information:

https://www.im.natixis.com/intl/intl-fund-documents

This document is issued to disclose sustainability-related information on this product, in relation to the Article 10 of the EU Sustainable Finance Disclosure Regulation (SFDR). Please refer to the prospectus of the fund and to the KIID before making any final investment decisions.