

**BPER INTERNATIONAL SICAV**  
Société d'Investissement à Capital Variable  
33A, avenue JF Kennedy  
L-1855 Luxembourg  
RCS Luxembourg B61517  
(the “Fund”)

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**NOTICE TO SHAREHOLDERS OF:**  
**BPER INTERNATIONAL SICAV – GLOBAL BALANCED RISK CONTROL;**  
**BPER INTERNATIONAL SICAV – GLOBAL HIGH YIELD;**  
**BPER INTERNATIONAL SICAV – FIXED INCOME CREDIT STRATEGIES;**  
**BPER INTERNATIONAL SICAV – GLOBAL BOND;**  
**BPER INTERNATIONAL SICAV – GLOBAL CONVERTIBLE BOND EUR;**  
**(Together the “Sub-Funds”)**

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**THIS LETTER REQUIRES YOUR IMMEDIATE ATTENTION**

29<sup>th</sup> November 2023

Dear Shareholders,

We are writing to inform you of certain amendments that will be made to the Prospectus of the Fund.

The summary below is a non-exhaustive list of changes made to the Prospectus. Shareholders are advised to obtain and read the Prospectus, which is available free of charge from the registered office of the Fund.

*Capitalized terms used but not defined herein shall have the same meaning as defined in the Prospectus except otherwise provided.*

**SFDR Reclassifications**

The Sub-Funds do not currently promote environmental and/or social characteristics and are therefore only subject to the disclosure obligations set out under Article 6 of the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “**SFDR**”).

The Board hereby informs you of its decision to reclassify the Sub-Funds to Article 8 products under the SFDR. In this context, the Sub-Funds will promote environmental and/or social characteristics, as further described in the SFDR RTS annexes of each Sub-Fund attached as Appendix 1 (the “**SFDR RTS Annexes**”).

Where relevant several formal correction and updates throughout the Prospectus having no consequences for shareholders of the Company have been made.

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**Shareholders disagreeing with the changes described above may redeem their Shares free of any charge on any Dealing Day from the date of this notice until 29 December 2023 (the effective date of these changes).**

Should you have any questions or concerns about the foregoing, please contact the Fund at its registered office in Luxembourg or the representative of the Fund in your jurisdiction.

Yours faithfully,

The Board

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

**Product name:** BPER International SICAV - Global BOND

**Legal entity identifier:** 5493006ICPHR7YO7S238

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

It will make a minimum of sustainable investments with an environmental objective: \_\_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of sustainable investments with a social objective: \_\_\_\_%

No

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

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

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

with a social objective

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

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

The following characteristics are promoted by the financial product:

1) A sustainability profile that is higher than its benchmark’s sustainability profile or a minimum of 51% of assets invested in issuers with sustainability profiles in the top half of the UBS ESG Consensus score scale.

2) The percentage of sub-fund assets invested in sovereign bonds from issuers showing “controversies” on the UBS ESG Risk Dashboard is lower than the percentage in the benchmark.

The benchmark is a broad market index which does not assess or include constituents according to environmental and/or social characteristics and therefore is not intended to be consistent with the characteristics promoted by the financial product. No ESG reference benchmark has been designated for the purpose of attaining the characteristics promoted by the financial product.

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

The above characteristics are measured using the following indicators respectively:

For Characteristic 1):

The UBS ESG consensus score is used to identify issuers/companies for the investment universe with strong environmental and social performance characteristics, or a strong sustainability profile. This UBS ESG consensus score is a normalized weighted average of ESG score data from internal and recognized external providers. Rather than relying on an ESG score from a single provider, the consensus score approach increases conviction in the validity of the sustainability profile.

The UBS ESG consensus score assesses sustainability factors, such as the performance of the relevant issuers/companies with reference to environmental, social and governance (ESG) aspects. These ESG aspects relate to the main areas in which the issuers/companies operate and their effectiveness in managing ESG risks. Environmental and social factors can include (amongst others) the following: environmental footprint and operational efficiency, environmental risk management, climate change, natural resource usage, pollution and waste management, employment standards and supply chain monitoring, human capital, diversity within the board of directors, occupational health and safety, product safety, as well as anti-fraud and anti-corruption guidelines.

The individual investments in the sub-fund have a UBS ESG consensus score (on a scale of 0-10, with 10 having the best sustainability profile).

For Characteristic 2):

The Portfolio Manager employs a proprietary ESG Risk Dashboard that combines multiple ESG data sources in order to identify companies with material ESG risks. An actionable risk signal highlights ESG risks to the Portfolio Manager for incorporation in their investment decision making process.

Controversies capture high impact incidents and events that may affect the prosperity and economic development of a country, such as (but not limited to) natural disasters, labor rights or environmental pollution. They measure the country's ability to manage the impact of these controversies in an effective and sustainable way.

● ***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.

**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 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

☒ 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.

#### ESG Integration:

ESG Integration is driven by taking into account material ESG risks as part of the research process. ESG integration enables the Portfolio Manager to identify financially relevant sustainability factors that impact investment decisions and to incorporate ESG considerations when implementing investment decisions, and allows ESG risks to be systematically monitored and compared to risk appetite and constraints. It also assists in portfolio construction through securities selection, investment conviction and portfolio weightings.

- For corporate issuers, this process utilizes an internal UBS ESG material issues framework which identifies the financially relevant factors per sector that can impact investment decisions. This orientation toward financial materiality ensures that analysts focus on sustainability factors that can impact the financial performance of the company and therefore investment returns. ESG integration can also identify opportunities for engagement to improve the company's ESG risk profile and thereby mitigate the potential negative impact of ESG issues on the company's financial performance. The Portfolio Manager employs an internal UBS ESG risk dashboard that combines multiple internal and external ESG data sources in order to identify companies with material ESG risks. An actionable risk signal highlights ESG risks to the Portfolio Manager for incorporation in their investment decision making process.

- For non-corporate issuers, the Portfolio Manager applies a qualitative or quantitative ESG risk assessment that integrates data on material ESG factors.

The analysis of material sustainability/ESG considerations can include many different aspects, such as the following among others: the carbon footprint, health and well-being, human rights, supply chain management, fair customer treatment and governance.

#### Sustainability Exclusion Policy:

The Sustainability Exclusion Policy of the Portfolio Manager outlines the exclusions applied to the investment universe of the financial product. The link to the Sustainability Exclusion Policy can be found in the main body of the Sales Prospectus.

#### ● **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 binding element(s) of the investment strategy are used to select the investments to attain the characteristic(s) promoted by this financial product:

Good governance practices include sound management structures.

For Characteristic 1):

A sustainability profile that is higher than its benchmark's sustainability profile or a minimum of 51% of assets invested in issuers with sustainability profiles in the top half of the UBS ESG Consensus score scale.

For Characteristic 2):

The percentage of sub-fund assets invested in sovereign bonds from issuers showing "controversies" on the UBS ESG Risk Dashboard is lower than the percentage in the benchmark. If the benchmark contains no sovereign bonds from issuers with "controversies", the sub-fund is not permitted to hold any issuers with "controversies".

The calculations do not take account of cash, derivatives and unrated investment instruments.

The characteristic(s) and the minimum proportion of investments used to meet the environmental and/or social characteristics promoted by the financial product are calculated at quarter end using the average of all business days' values in the quarter.

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

Not applicable.

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

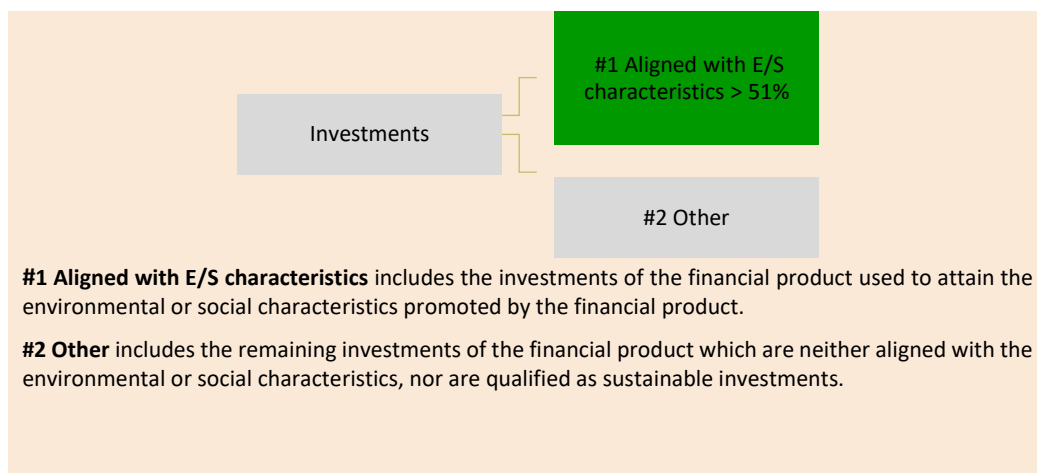
Good corporate governance is a key driver of sustainable performance and is therefore embedded in the Portfolio Manager's investment strategy. The Portfolio Manager employs a proprietary ESG Risk Dashboard that combines multiple ESG data sources from internal and recognized external providers in order to identify companies with material ESG risks. An actionable risk signal highlights ESG risks to the Portfolio Manager for incorporation in their investment decision making process. The assessment of good governance includes consideration of board structure and independence, remuneration alignment, transparency of ownership and control, and financial reporting.

**Asset allocation** describes the share of investments in specific assets.



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

The minimum proportion of the investments used to meet the environmental and/or social characteristics promoted by the financial product is 51%.



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

The use of derivatives by the Sub-Fund does not attain the environmental or social characteristics promoted by the Sub-Fund.



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

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 Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of 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<sup>1</sup>?**

☐ Yes:

☐ In fossil gas

☐ In nuclear energy

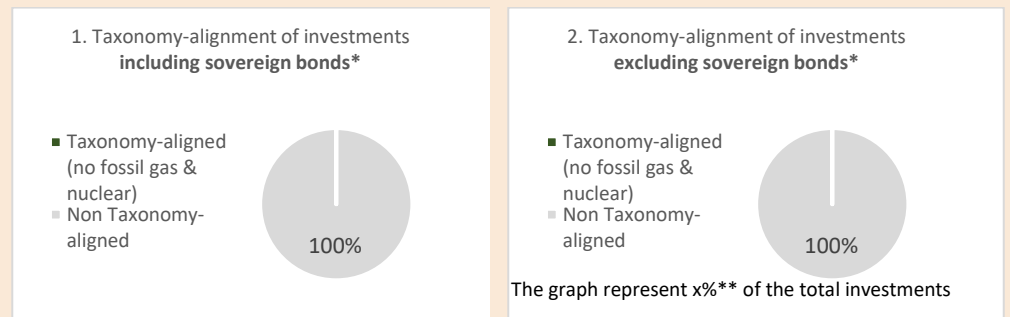
☒ No

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

\*\* No percentage has been inserted as it is not relevant (no Taxonomy-aligned investments)

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

For nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are Commission Delegated Regulation (EU) 2022/1214.

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy, neither to a minimum share of investments in transitional and enabling activities.

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



**What is the minimum share of socially sustainable investments?**

Not applicable.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



**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?**

N/A.



**Where can I find more product specific information online?**

More product-specific information can be found on the website: [www.fundinfo.com](http://www.fundinfo.com)



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

**Product name:** BPER INTERNATIONAL SICAV – GLOBAL  
BALANCED RISK CONTROL

**Legal entity identifier:**  
549300F65TFS03M6HJ35

## 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
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ____%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ____%</b>	<input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The Sub-Fund promotes broad Environmental, Social and Governance (ESG) characteristics through consideration of a number of binding ESG characteristics across both equity and fixed income issuers. By investing in securities issued by companies or governments that uphold high standards of ESG behaviour, the Sub-Fund promotes

- Environmental characteristics, namely climate change mitigation, avoiding environmental harm, reducing carbon emissions, and preventing pollution and waste
- social characteristics, namely as tackling inequality or fostering social cohesion, promoting social integration and labour relations, investing in human capital, promoting access to finance and healthcare, and promoting nutrition and health

The Sub-Fund has not designated a reference benchmark for the purposes of attaining its environmental 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 sustainability indicators that the Investment Manager uses to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund vary depending on the nature of the underlying investments.

- The number of regional equity baskets and the core equity portfolios that outperformed their relevant benchmark by achieving a weighted average score that is greater than the corresponding benchmark's weighted average score on both the MSCI ESG score and the MSCI Low Carbon Transition score.
- The application of exclusionary screens to the Sub-Fund is measured by the percentage of the equity investments which breach the exclusionary screens. The relevant sustainability indicator is therefore that 0% of the equity investments in the Sub-Fund are in breach of the Exclusion List.
  - Whether the Sub-Fund's Government bonds benchmark outperforms the representative benchmark by achieving a weighted average score that is greater than the representative benchmark's weighted average score on MSCI ESG Government bonds rating.
  - The application of the exclusionary screen to the Sub-Fund's investments in government bonds is measured by the percentage of the Sub-Fund's government bonds which breach the exclusionary screen. The relevant sustainability indicator is therefore that 0% of the Sub-Fund's government bonds are in breach of the exclusionary criteria, i.e. no country with a rating of "CCC" is held by the Sub-Fund.
  - The number of ESG-aligned CDS which references the iTraxx MSCI ESG Screened Europe Index to which the Fund has exposure (at least one).

- **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.

**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?**

Not applicable.

*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 not 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, The Sub-Fund considers the following PAI indicators through the application of the Sub-Fund’s binding environmental or social characteristics (as described in this document):

- **PAI indicators numbers 1-3 (GHG emissions, carbon footprint and GHG intensity of investee companies):** The equity investments of the Sub-Fund consider PAI indicators numbers 1-3 regarding GHG emissions in part through its equity investments. The Sub-Fund considers these indicators because it applies a tilt considering the Low Carbon Transition score to the equities held in the equity baskets. The Low Carbon Transition score is designed to identify potential leaders and laggards by measuring companies’ exposure to and management of risks and opportunities related to the low carbon transition and assesses carbon intensity of each of our equity securities. The Low Carbon Transition score takes into account GHG emissions (scopes 1-3).
- **PAI indicator number 4 (exposure to companies active in the fossil fuel sector):** The Sub-Fund considers this PAI indicator in part through its investments in equities because it excludes issuers with high exposure to carbon-intensive activities, with a view to mitigation of climate-related financial risks. Namely, the Sub-Fund excludes companies that derive 5% or more of their revenue from the mining of thermal coal or the extraction of oil sands.
- **PAI indicators numbers 7-9 (activities negatively affecting biodiversity-sensitive areas, emissions to water and hazardous waste and radioactive waste ratio):** The Sub-Fund considers these indicators in part through its investments in equities, as a proxy, it excludes investments in companies involved in ongoing severe structural controversy cases related to environmental harm where we believe appropriate remedial action has not been taken. These controversies include controversies relating to Biodiversity & Land Use, Toxic Emissions & Waste, Water Stress, Operational Waste (Non-Hazardous), Supply Chain Management amongst others.
- **PAI indicator number 10 (violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises):** The Sub-Fund considers this PAI indicator through its investments in equities because it excludes investments in issuers flagged in breach of one or more selected global norms and conventions, including the United Nations Global Compact Principles (UNGC), United Nations Guiding Principles for Business and Human Rights, [the International Labour Organization’s fundamental principles] and the OECD Guidelines for Multinational Enterprises
- **PAI indicator number 14 (exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)):** The Sub-Fund considers this PAI indicator through its investments in equities because it excludes investments in issuers which derive any revenue from controversial weapons (including all the controversial weapons listed for PAI number 14).

More information on principal adverse impacts on sustainability factors is available in the periodic reporting pursuant to Article 11(2) of the SFDR.

☐ 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 Sub-Fund's investment objective is to provide an attractive level of total return, measured in Euro, through investing primarily in a portfolio of transferable securities and money market instruments globally and through the use of financial derivative instruments, while incorporating ESG considerations

The investment process is subject to regular review, as part of a control and monitoring framework implemented by the Investment Manager. Morgan Stanley Investment Management's Compliance, Risk and Portfolio Surveillance teams collaborate with the investment team to conduct regular portfolio / performance reviews and systemic checks to ensure compliance with portfolio investment objectives, investment and client guidelines, taking into account changing market conditions, information and strategy developments.

The investment strategy followed by the Investment Manager to promote environmental and social characteristics vary depending on the nature of the underlying investments.

**Equity investments**

We consider exclusions and ESG tilt for the Sub-Fund's equity investments sustainability characteristics.

**Exclusions:**

- The Sub-Fund seeks to attain the environmental characteristics of climate change mitigation by excluding investments in certain types of fossil fuels, namely, the Sub-Fund excludes companies that derive 5% or more of their revenue from the mining of thermal coal or the extraction of oil sands, and of avoiding environmental harm by excluding investments which have caused severe environmental harm where appropriate remedial action has not been taken.
- In addition, the Sub-Fund seeks to attain the social characteristic of avoiding investments in activities which can cause harm to human health and wellbeing.
- These screens mean that the equity investments of the Sub-Fund will not include equities of issuers with certain specified criteria, as follows:

(1) with high exposure (namely, the Sub-Fund excludes companies that derive 5% or more of their revenue from the mining of thermal coal or the extraction from oil sands or arctic oil and gas assets or derive 50% or more of revenues from coal-fired power generation) to carbon-intensive activities;

(2) with ties to the manufacturing or production of controversial weapons or intended use components;

(3) that manufacture civilian firearms;

(4) that manufacture tobacco products or derive 10% or more of their revenue from tobacco products;

(5) that derive 10% or more of their revenue from gambling-related business activities;

(6) that derive 10% or more of their revenue from adult entertainment activities; or

(7) that have experienced the most severe ESG controversy cases or are involved in ongoing severe structural controversy cases related to environmental harm and where the investment team believe appropriate remedial action hasn't been taken.

- The application of the exclusionary screens to the Sub-Fund's equity investments is measured by the percentage of the Sub-Fund's equity investments which breach the exclusionary screens. The relevant sustainability indicator is therefore that 0% of the Sub-Fund's equity investments are in breach of the Sub-Fund's Restriction Screening Policy. The Sub-Fund uses MSCI ESG Data (an external data provider) to determine business activities.
- Companies violating the United Nations Global Compact (UNGC) principles, which do not demonstrate credible corrective action will be excluded from the investment universe.

**- ESG tilt:**

- The Sub-Fund seeks to attain environmental characteristics ( reducing carbon emissions; and preventing pollution and waste), social characteristics (tackling inequality or fostering social cohesion; promoting social integration and labour relations; investing in human capital; promoting access to finance and healthcare; and promoting nutrition and health) and governance characteristics (good corporate governance and corporate behaviour) by applying an ESG tilt within the portfolio for all equity securities, using the MSCI ESG score and the MSCI Low Carbon Transition score.
- The ESG score used is the final industry adjusted ESG score (as determined by MSCI) and assesses each company based on a combination of the key issues that are most material to a company, out of a possible 35 ESG issues (such as reduction of carbon emissions, preventing pollution, tackling equality, and access to healthcare etc.) and normalised to the Industry peer set, as determined by MSCI. Companies with higher ESG scores are assessed as better managing long-term financially material ESG risks and opportunities relative to their industry peers compared to those with lower score.

- The Low Carbon Transition score (as determined by MSCI) measures a company's level of alignment to the Low Carbon Transition. Companies with higher Low Carbon Transition score are more aligned with the Low Carbon Transition compared to the companies with lower scores.
- ESG tilt process: the Sub-Fund allocates its global equity investment to five regional equity baskets. The application of the ESG tilt on the Sub-Fund's equity investments seeks to ensure that each regional equity basket will achieve a weighted average ESG and Low Carbon Transition score that is greater than the equivalent benchmark determined by the investment manager as representative of that region's scores with regard to the weighted average of:
  - o the ESG score, as described above; and
  - o the Low Carbon Transition score, as described above.
- In addition, the application of the ESG tilt on the Sub-Fund's equity investments seeks to ensure that the core equity portfolio (which is made up of the total of the five regional baskets) will achieve a weighted average ESG and Low Carbon Transition score that is greater than the MSCI ACWI index with regard to the two scores referenced above.

#### **Government bonds**

The Sub-Fund aims to attain the environmental and social characteristic of improved ESG performance by encouraging countries to manage their ESG risks. The Sub-Fund achieves this through exclusions and ESG tilt:

- **Exclusions:**
  - Excluding investing in the government bonds of countries poorly managing their ESG risks; i.e. those with an MSCI ESG Government bond rating of 'CCC'
  - The application of the exclusionary screen to the Sub-Fund's investments in government bonds is measured by the percentage of the Sub-Fund's government bonds which breach the exclusionary screen. The relevant sustainability indicator is therefore that 0% of the Sub-Fund's government bonds are in breach of the exclusionary criteria, i.e. no country with a rating of 'CCC' is held by the Sub-Fund.
- **ESG tilt:**
  - Applying an ESG tilt to the government bonds benchmark, so that the Sub-Fund's investments in government bonds track a better ESG profiled benchmark in this regard.
  - The Sub-Fund uses a proprietary GBaR Government ESG score to assess and compare each government issuer to create a proprietary Sovereign ESG benchmark upon which the Investment Manager overlays credit research. The GBaR Government ESG Score is calculated by combining:
    - o the ESG score of the government, as determined by the MSCI ESG Government Rating; and
    - o the year-on-year change in ESG score as determined by the MSCI ESG Government Rating
  - The MSCI ESG Government Rating reflects how countries' exposure to and management of ESG risk factors may affect the long-term sustainability and long-term competitiveness of their economies. Issuers with higher MSCI ESG Government bond ratings are assessed as better managing their material ESG risk factors.
  - The Investment Manager will overweight sovereigns which are outperforming the average performance in the Bloomberg Global G7 Total Return Index (excluding elements of that index which concern Canada, as Canadian government bonds do not form part of the Sub-Fund's investment universe), with regard to the GBaR Government ESG Score, while underweighting those that perform worse than the average.
  - This process, however, remains subject to the Investment Manager's credit research overlay, which may result in changes to the weightings of sovereigns resulting from the process described to account for the Investment Manager's views on the credit quality of those sovereigns. In limited circumstances, application of the Investment Manager's credit overlay could result in sovereign bonds held by the Sub-Fund not outperforming the benchmark on ESG issues, though the Investment Manager does not expect that this will generally be the case.
  - The application of the Sub-Fund's ESG assessment to the Sub-Fund's Government bonds benchmark aims to ensure that the government bonds in the Sub-Fund will achieve a weighted average MSCI ESG Government Rating that is greater than the weighted average score of a representative index of G7 government bonds (excluding Canada) determined by the Investment Manager with regard to the MSCI ESG Government bonds rating.

#### **Credit**

The Sub-Fund aims to attain the environmental and social characteristic of improved ESG performance by encouraging issuers to manage their ESG risks. The Sub-Fund achieves this through:

- **Exposure to ESG CDS:**
  - The Fund sells credit protection under index credit default swaps ("CDS") in order to gain exposure to corporate credit.
  - The Fund will gain this exposure through at least one ESG-aligned CDS, which references the iTraxx MSCI ESG Screened Europe Index, further details can be found further below in the section "*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?*". Exposure to this

index seeks to target the Fund's credit exposure towards issuers that exhibit stronger performance with respect to management of ESG risks, as the index is screened by MSCI to exclude issuers with exposure to certain activities that have the potential to be harmful to human health and wellbeing, that have been subject to ESG controversies, or that have an MSCI ESG rating of BBB and below.

Further details regarding these exclusions are set out below in response to the question "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 sustainability indicator for this characteristic is the number of ESG-aligned CDS to which the Fund has exposure.

● ***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?***

This Sub-Fund has a number of ESG features which are binding on the Sub-Fund's investment decisions and relate to different types of investments in the Sub-Fund, which are described in further detail in responses to previous questions.

**Equity investments**

With regard to the equity investments of the product, the Sub-Fund applies the following binding elements in the investment strategy:

- **Exclusions:** the Investment Manager imposes certain ESG exclusionary screens on all the equity investments of the Sub-Fund, as set out in the Sub-Fund's Restriction Screening Policy. Further detail on the nature of these exclusions is set out above in response to the question "*What investment strategy does this financial product follow?*".  
0% of the Sub-Fund's equity investments will breach of the Sub-Fund's Restriction Screening Policy.
- **ESG tilt:** as noted above, the Sub-Fund allocates its global equity investment to five regional baskets. The Investment Manager seeks to ensure that each of the regional baskets achieve a weighted average ESG and Low Carbon Transition score that is greater than the equivalent benchmark's scores for that region. Finally, the core equity portfolio (which comprises all five regional baskets) as a whole will also achieve a weighted average ESG and Low Carbon Transition score that is greater than the MSCI ACWI index's scores. Each regional equity basket and the core equity portfolio are considered to have outperformed their relevant benchmark if they achieve a weighted average score that is better than the corresponding benchmark's weighted average score on both the MSCI ESG score and the MSCI Low Carbon Transition score.

**Government bonds**

With regard to the Government bond investments of the product, the Sub-Fund applies the following binding elements in the investment strategy:

- **Exclusions:** Given the Sub-Fund's exclusion outlined above in response to the question "*What investment strategy does this financial product follow?*"  
0% of the Sub-Fund's investments will be in countries with a current ESG Government Rating "CCC". The ESG Government Ratings (as determined by MSCI) identify a company's exposure to and management of environmental, social and governance risk factors and consider how these factors might impact the long-term sustainability of its economy.
- **ESG tilt:** The Sub-Fund uses a proprietary GBaR Government ESG score to assess and compare each government issuer to create a proprietary Sovereign ESG benchmark upon which the Investment Manager overlays credit research. The GBaR Government ESG Score is calculated by combining:
  - the ESG score of the government, as determined by the MSCI ESG Government Rating; and
  - the year-on-year change in ESG score as determined by the MSCI ESG Government RatingThe MSCI ESG Government Rating reflects how countries' exposure to and management of ESG risk factors may affect the long-term sustainability and long-term competitiveness of their economies. Issuers with higher MSCI ESG Government bond ratings are assessed as better managing their material ESG risk factors.

The Investment Manager will overweight sovereigns which are outperforming the average performance in the Bloomberg Global G7 Total Return Index (excluding elements of that index which concern Canada, as Canadian government bonds do not form part of the Sub-Fund's investment universe), with regard to the GBaR Government ESG Score, while underweighting those that perform worse than the average.

This process, however, remains subject to the Investment Manager's credit research overlay, which may result in changes to the weightings of sovereigns resulting from the process described to account for the Investment Manager's views on the credit quality of those sovereigns. In limited circumstances, application of the Investment Manager's credit overlay could result in sovereign bonds held by the Sub-Fund not outperforming the benchmark on ESG issues, though the Investment Manager does not expect that this will generally be the case.

The application of the Sub-Fund's ESG assessment to the Sub-Fund's Government bonds benchmark aims to ensure that the government bonds in the Sub-Fund will achieve a weighted average MSCI ESG Government Rating that is greater than the weighted average score of a representative index of G7

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

government bonds (excluding Canada) determined by the Investment Manager with regard to the MSCI ESG Government bonds rating.

#### **Credit**

1. **Exposure to ESG CDS:** As stated above, the Fund sells credit protection under index CDS in order to gain exposure to corporate credit. The Fund will gain this exposure through at least one ESG-aligned CDS, which references the iTraxx MSCI ESG Screened Europe Index. Exposure to this index seeks to promote human health and wellbeing, excludes issuers with ESG controversies and promotes the monitoring of ESG risks, because MSCI applies a screen to the index constituents to exclude the following entities:
  - entities breaching specific revenue thresholds due to their involvement in the following activities: adult entertainment; alcohol; civilian firearms; controversial weapons; conventional weapons; gambling; genetic engineering; nuclear power; nuclear weapons; tobacco and thermal coal;
  - entities with MSCI ESG controversy scores of 0. The MSCI ESG controversy scores measures how well an entity adheres to international norms and principles such as the UN Global Compact and ILO Core Conventions, and it rates entities based on a scale of 0 to 10; and
  - entities with MSCI ESG rating of BBB and below. MSCI ESG ratings aim to measure the key ESG risks and opportunities faced by a company and how well those risks are managed with respect to its industry peers.

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

Not applicable.

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

The Investment Manager uses the results of internal and external assessments to exclude companies perceived to violate key issues related to 'Good Governance', in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

Companies violating the United Nations Global Compact (UNGC) principles, which do not demonstrate credible corrective action will be excluded from the investment universe.

In addition, the portfolio manager employs a proprietary systematic screening and ESG integration approach that combines multiple ESG data sources from internal and recognized external providers in order to identify companies with material ESG risks including in relation to governance. This implementation is monitored on an ongoing basis.



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

**Asset allocation** describes the share of investments in specific assets. Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made

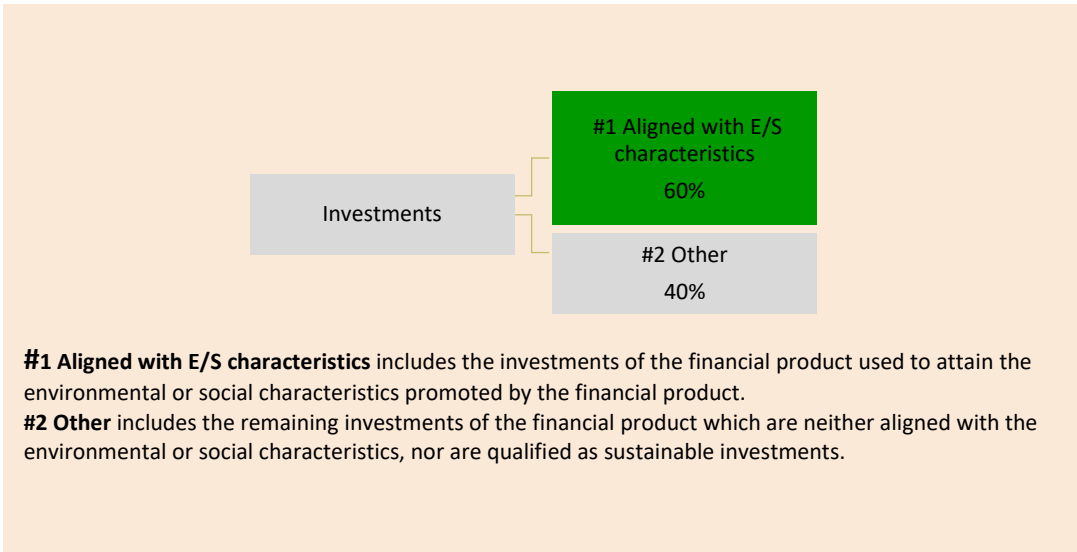
The Investment Manager will ensure that 60% or more of the Sub-Fund's investments are aligned with E/S characteristics. As described above, however, the relevant E/S characteristics vary depending on the nature of the Sub-Fund's investment. The below provides an indication of the proportion of the Sub-Fund's assets expected to promote the environmental or social characteristics described, based on historical data. Investors should note, however, that actual asset allocations may vary significantly over time due to the asset mix determined by the Investment Manager and as a result of investment performance.

- Equity investments are expected to make up between 20% to 70% of the Sub-Fund's portfolio (as measured by the total Sub-Fund value). The screens and ESG tilt of the Sub-Fund are applied to all the direct equity investments of the Sub-Fund.
- Credit exposure obtained via investment in the ESG index CDS product is expected to make up approximately 5% to 10% of the Fund's portfolio (as measured by the total Fund value).
- Investments in government bonds are expected to make up approximately 15% to 35% of the Sub-Fund's portfolio (as measured by the total Sub-Fund value). The selection process for government bonds incorporates the ESG features described above.

As explained above, the ESG tilt of the equity investments is applied at the level of the five regional baskets and the portfolio of equity investments (and not at the level of individual holdings, some of which may on an individual basis have an ESG score or Low Carbon Transition score lower than the average for the regional basket or for the whole portfolio of equity investments).



It is anticipated that up to 40% of the Sub-Fund’s assets may be invested in hedging and/or cash instruments for efficient portfolio management purposes, other instruments which do not align with any environmental or social characteristics, or investments for which adequate data is not available.



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

The Fund sells credit protection under index CDS in order to gain exposure to corporate credit. The Fund will gain this exposure through at least one ESG-aligned CDS, which references the iTraxx MSCI ESG Screened Europe Index. This index which has ESG features as described in our response to the question, “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?”. In addition, the Fund will gain exposure to corporate credit through other ESG-aligned CDS where available and appropriate.



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

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of 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<sup>2</sup>?**

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

and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory note in the n. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are Commission Delegated Regulation (EU) 2022/1214.



☐ Yes:

☐ In fossil gas

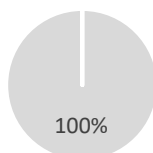
☐ In nuclear energy

☒ 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.**

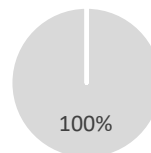
1. Taxonomy-alignment of investments including sovereign bonds\*

■ Taxonomy-aligned (no fossil gas & nuclear)  
■ Non Taxonomy-aligned



2. Taxonomy-alignment of investments excluding sovereign bonds\*

■ Taxonomy-aligned (no fossil gas & nuclear)  
■ Non Taxonomy-aligned



The graph represent x%\*\* of the total investments

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

\*\* No percentage has been inserted as it is not relevant (no Taxonomy-aligned investments)

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

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy, neither to a minimum share of investments in transitional and enabling activities.

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

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

● **What is the minimum share of socially sustainable investments?**

Not applicable.

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



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



Investments categorised as “#2 Other” include:

- hedging instruments;
- cash held as ancillary liquidity;
- investments for which the investment team is lacking data in order to assess if they qualify as promoting environmental or social characteristics;
- any other investments which do not promote environmental or social characteristics (such as derivatives used for speculative purposes which do not have any ESG features).

There are no minimum environmental or social safeguards applied to such investments.



**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?**

Not applicable.



**Where can I find more product specific information online?**

More product specific information can be found on the website:

[www.fundinfo.com](http://www.fundinfo.com)

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

**Product name:** BPER International SICAV - Global Convertible Bond EUR

**Legal entity identifier:** 549300UHN3VY00Q0S79

## Environmental and/or social characteristics

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



**Yes**



It will make a minimum of sustainable investments with an environmental objective: \_\_\_\_%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of sustainable investments with a social objective: \_\_\_\_%



**No**



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



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



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



with a social objective



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

**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?

The following characteristics are promoted by the financial product:

- 1) A sustainability profile that is higher than its benchmark's sustainability profile or a minimum of 51% of the sub-fund invested in companies with sustainability profiles in the top half of the sub-fund's investment universe (ranked by the UBS ESG consensus score).
- 2) A lower Weighted Average Carbon Intensity (WACI) than the reference benchmark or a low absolute carbon profile.

The benchmark is a broad market index which does not assess or include constituents according to environmental and/or social characteristics and therefore is not intended to be consistent with the characteristics promoted by the financial product. No ESG reference benchmark has been designated for the purpose of attaining the characteristics promoted by the financial product.

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

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

The above characteristics are measured using the following indicators respectively:

For Characteristic 1):

The investment universe is defined as all convertible, exchangeable and warrant-linked bonds with a minimum capitalisation of USD 50 m provided by the index provider (Refinitiv). The investment universe is ranked by the UBS ESG Consensus score.

The UBS ESG consensus score is used to identify issuers/companies for the investment universe with strong environmental and social performance characteristics, or a strong sustainability profile. This UBS ESG consensus score is a normalized weighted average of ESG score data from internal and recognized external providers. Rather than relying on an ESG score from a single provider, the consensus score approach increases conviction in the validity of the sustainability profile.

The UBS ESG consensus score assesses sustainability factors, such as the performance of the relevant issuers/companies with reference to environmental, social and governance (ESG) aspects. These ESG aspects relate to the main areas in which the issuers/companies operate and their effectiveness in managing ESG risks. Environmental and social factors can include (amongst others) the following: environmental footprint and operational efficiency, environmental risk management, climate change, natural resource usage, pollution and waste management, employment standards and supply chain monitoring, human capital, diversity within the board of directors, occupational health and safety, product safety, as well as anti-fraud and anti-corruption guidelines.

The individual investments in the sub-fund have a UBS ESG consensus score (on a scale of 0-10, with 10 having the best sustainability profile).

The sub-fund carries out an ESG analysis using the UBS ESG Consensus Score for:

- at least 90% (based on market value) of the developed market equities or convertible bonds that may be converted into high-cap (equity market capitalisation greater than EUR 10 billion) developed market equities, other debt securities and money market instruments (regardless of company size and credit rating), and
- at least 75% (based on market value) for all other equities or convertible bonds

Developed markets are defined as those contained in the MSCI World index. The calculation excludes cash, certain derivatives and other instruments without a rating.

For convertible bonds, all ratings and calculations relating to ESG Consensus Score, sustainability profile and CO2 are based on the share into which the respective convertible bond may be converted (as opposed to the bond issuer). The issuer of a convertible bond is taken into consideration for all exclusion-based restrictions.

For money market instruments and non-convertible bonds, all ratings and calculations relating to ESG Consensus Score, CO2 and all exclusion-based restrictions are based on their respective issuers.

For equities, all calculations relating to ESG Consensus Score, CO2 and all exclusion-based restrictions are based on the respective issuer.

For Characteristic 2):

Scope 1 and 2 Weighted Average Carbon Intensity (WACI):

- Scope 1 refers to direct carbon emissions and therefore includes all direct greenhouse gas emissions from owned or controlled sources of the relevant entity or issuer.
- Scope 2 refers to indirect carbon emissions and therefore includes greenhouse gas emissions from the generation of electricity, thermal energy and/or steam that is consumed by the relevant entity or issuer.

Low absolute carbon profile is defined as below 100 tonnes of CO2 emissions per million US dollars of revenues.

The portfolio share with a lower Weighted Average Carbon Intensity (WACI) than the reference benchmark or a low absolute carbon profile.

● ***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.

**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?**

Not applicable.

*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
- ☒ 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.

**ESG Integration:**

ESG Integration is driven by taking into account material ESG risks as part of the research process. ESG integration enables the Portfolio Manager to identify financially relevant sustainability factors that impact investment decisions and to incorporate ESG considerations when implementing investment decisions, and allows ESG risks to be systematically monitored and compared to risk appetite and constraints. It also assists in portfolio construction through securities selection, investment conviction and portfolio weightings.

- For corporate issuers, this process utilizes an internal UBS ESG material issues framework which identifies the financially relevant factors per sector that can impact investment decisions. This orientation toward financial materiality ensures that analysts focus on sustainability factors that can impact the financial performance of the company and therefore investment returns. ESG integration can also identify opportunities for engagement to improve the company’s ESG risk profile and thereby mitigate the potential negative impact of ESG issues on the company’s financial performance. The Portfolio Manager employs an internal UBS ESG risk dashboard that combines multiple internal and external ESG data sources in order to identify companies with material ESG risks. An actionable risk signal highlights ESG risks to the Portfolio Manager for incorporation in their investment decision making process.
- For non-corporate issuers, the Portfolio Manager applies a qualitative or quantitative ESG risk assessment that integrates data on material ESG factors.

The analysis of material sustainability/ESG considerations can include many different aspects, such as the following among others: the carbon footprint, health and well-being, human rights, supply chain management, fair customer treatment and governance.

**Sustainability Exclusion Policy**

The Sustainability Exclusion Policy of the Portfolio Manager outlines the exclusions applied to the investment universe of the financial product. The link to the Sustainability Exclusion Policy can be found in the main body of the Prospectus.

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

- ***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 binding element(s) of the investment strategy are used to select the investments to attain the characteristic(s) promoted by this financial product:

Characteristic 1):

A sustainability profile that is higher than its benchmark's sustainability profile or a minimum of 51% of the sub-fund invested in companies with sustainability profiles in the top half of the sub-fund's investment universe (ranked by the UBS ESG consensus score).

Characteristic 2):

A lower Scope 1 and 2 Weighted Average Carbon Intensity (WACI) than its benchmark or a low absolute carbon profile.

The calculations do not take account of cash, derivatives and unrated investment instruments.

The binding element(s) are calculated at quarter end using the average of all of business days' values in the quarter.

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

Not applicable.

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

Good corporate governance is a key driver of sustainable performance and is therefore embedded in the Portfolio Manager's investment strategy. The Portfolio Manager employs a proprietary ESG Risk Dashboard that combines multiple ESG data sources from internal and recognized external providers in order to identify companies with material ESG risks. An actionable risk signal highlights ESG risks to the Portfolio Manager for incorporation in their investment decision making process. The assessment of good governance includes consideration of board structure and independence, remuneration alignment, transparency of ownership and control, and financial reporting.



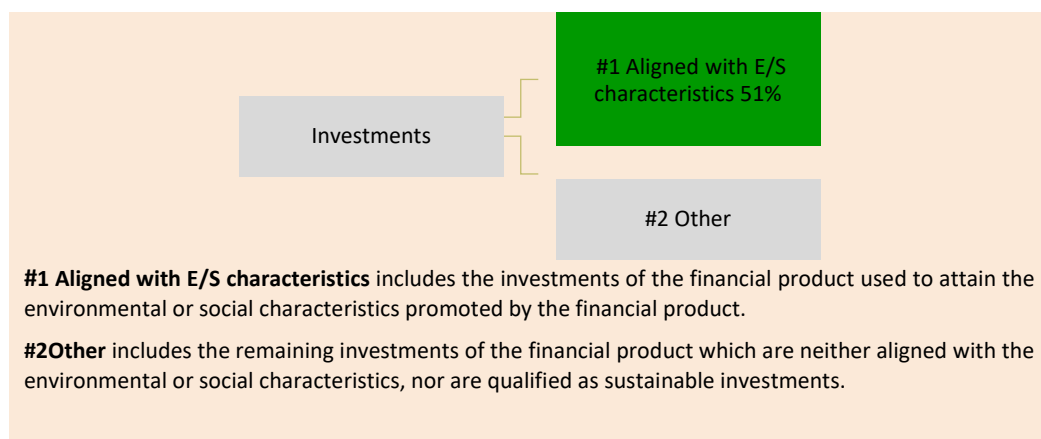
**Asset allocation** describes the share of investments in specific assets.

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

The minimum proportion of the investments used to meet the environmental and/or social characteristics promoted by the financial product is 51%.

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.



- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?***  
Not applicable.



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

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of 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<sup>3</sup>?**

- ☐ Yes:
- ☐ In fossil gas      ☐ In nuclear energy
- ☒ No

<sup>3</sup> 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.



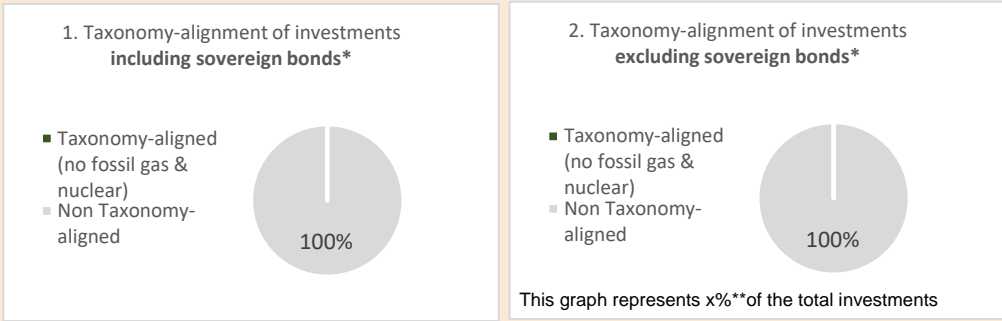
To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

**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.

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 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.  
\*\* No percentage has been inserted as it is not relevant (no Taxonomy-aligned investments)

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

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy, neither to a minimum share of investments in transitional and enabling activities.



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

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



**What is the minimum share of socially sustainable investments?**

Not applicable.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management. Unrated instruments may also include securities for which data needed for the measurement of attainment of environmental or social characteristics is not available.



**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?**

Not applicable.



**Where can I find more product specific information online?**

More product-specific information can be found on the website: [www.fundinfo.com](http://www.fundinfo.com)

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

**Product name:** BPER International SICAV – Global High Yield **Legal entity identifier:** 5493004BMQNV0Q5RZJ06

## Environmental and/or social characteristics

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



**Yes**

☐ It will make a minimum of sustainable investments with an environmental objective: \_\_\_\_%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of sustainable investments with a social objective: \_\_\_\_%



**No**

☐ 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

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

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

☐ with a social objective



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

**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?

This Sub-Fund is a feeder fund of Janus Henderson Horizon Fund – Global High Yield Bond Fund (the “Master Fund”), a sub-fund of Janus Henderson Horizon Fund, a Luxembourg SICAV registered under Part I of the 2010 Law. The Sub-Fund will invest at least 85% of its assets in Class I2 HEUR shares in the Master Fund. The Master Fund is categorised as promoting environmental and social characteristics in accordance with article 8 of the Sustainable Finance Disclosure Regulation. Via its exposure to the Master Fund, the Sub-Fund’s assets are indirectly invested in assets that promote environmental and/or social characteristics. Therefore, the environmental and social characteristics of the Sub-Fund shall be read in conjunction with those of the Master Fund.

The Master Fund promotes climate change mitigation and support for the UNGC Principles (which cover matters including human rights, labour, corruption, and environmental pollution). The Master Fund also seeks to avoid investments in certain activities with the potential to cause harm to human health and wellbeing by applying binding exclusions. The Master Fund does not use a reference benchmark to attain its environmental 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

The sustainability indicators used to measure the attainment of the environmental or social characteristics of the Sub-Fund shall be read in conjunction with the one of the Master Fund.

The sustainability indicators used to measure the attainment of the environmental or social characteristics promoted by the Master Fund include:

- Carbon - Carbon Intensity Scope 1&2  
*This represents the company's most recently reported or estimated Scope 1 + Scope 2 greenhouse gas emissions normalized by sales, which allows for comparison between companies of different sizes.*
- Overall UN GC Compliance Status
- ESG Exclusionary screens – see “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?” below for details on the exclusions.

- **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*

**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 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, The manner in which the Sub-Fund considers adverse impacts on sustainability factors shall be read in conjunction with that of the Master Fund.

The Investment Manager of the Master Fund considers the following principal adverse impacts on sustainability factors (“PAIs”):

<b>Principal Adverse Impact</b>	<b>How is PAI considered?</b>
GHG Emissions	Exclusionary screens
Carbon Footprint	Exclusionary screens
GHG Intensity of Investee Companies	Exclusionary screens
Exposure to companies active in fossil fuel	Exclusionary screens
Violations of UNGC and OECD	Exclusionary screens
Exposure to controversial weapons	Exclusionary screens

Please see the Master Fund’s SFDR website disclosures for further details on the current approach adopted and PAIs considered. The link can be found in the supplement.

The Master Fund will make information available on how it has considered the PAIs in its periodic report.



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

The Sub-Fund will invest at least 85% of its net assets in units of the Master Fund, and as such the investment strategy of the Sub-Fund shall be read in conjunction with the one of the Master Fund.

The Master Fund seeks an overall income with the potential for capital growth through exposure to global high yield bonds.

The binding elements of the investment strategy described below are implemented as exclusionary screens which are coded into the compliance module of the Investment Manager’s order management system utilising third-party data provider(s) on an ongoing basis. The exclusionary screens are implemented on both a pre and post trade basis enabling the Investment manager to block any proposed transactions in an excluded security and identify any changes to the status of holdings when third-party data is periodically updated.

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

The binding elements of the investment strategy of the Sub-Fund shall be read in conjunction with those of the Master-Fund. The Master-Fund’s binding elements of the investment strategy are as follows:

The Investment Manager of the Master Fund uses specific screens to help achieve some of the promoted characteristics. For example- to promote climate change mitigation, screens are applied to avoid investment in certain high carbon activities, and it is expected that this will result

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

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

in the fund having a lower carbon profile. Another example is that to promote support for the UNGC Principles, screens are applied so that the Master Fund does not invest in issuers that are in breach of the UNGC Principles based on third party data and/or internal research.

The Investment Manager of the Master Fund applies screens to exclude direct investment in corporate issuers based on their involvement in certain activities. Specifically, issuers are excluded if they derive more than 10% of their revenue from oil sands extraction, arctic oil and gas, thermal coal extraction, tobacco, or adult entertainment. Issuers are also excluded if they are deemed to have failed to comply with the UNGC Principles (which cover matters including human rights, labour, corruption, and environmental pollution).

The Master Fund also applies the Janus Henderson's Firmwide Exclusions Policy (the "Firmwide Exclusions Policy"), which includes controversial weapons:

This applies to all the investment decisions made by the Management Company or Investment Manager of the Master Fund. The Janus Henderson's Firmwide Exclusions Policy may be updated from time to time.

Presently, investment is not permitted in entities involved in the current manufacture of, or minority shareholding of 20% or greater in a manufacturer of controversial weapons, namely:

- (i) Cluster munitions;
- (ii) Anti-Personnel mines;
- (iii) Chemical weapons;
- (iv) Biological weapons.

Classification of issuers is primarily based on activity identification fields supplied by our third-party ESG data providers. This classification is subject to an investment research override in cases where sufficient evidence exists that the third-party data field is not accurate or appropriate. In any scenario where a portfolio position is identified as not meeting this exclusion criteria for any reason (legacy holding, transition holding, etc.) the Investment Manager shall be granted 90 days to review or challenge the classification of the issuer if appropriate. After this period, in the event an investment research override is not granted divestment is required immediately under normal market trading circumstances.

For the purposes of the AMF doctrine, the extra-financial analysis or rating as described above is higher than:

- a. 90% for equities issued by large capitalisation companies whose registered office is located in "developed" countries, debt securities and money market instruments with an investment grade credit rating, sovereign debt issued by developed countries;
- b. 75% for equities issued by large capitalisations whose registered office is located in "emerging" countries, equities issued by small and medium capitalisations, debt securities and money market instruments with a high yield credit rating and sovereign debt issued by "emerging" countries.

The Investment Manager of the Master Fund may only invest in companies that would be excluded by the screens described above if the Investment Manager believes, based on its own research and as approved by its ESG Oversight Committee, that the third-party data used to apply the exclusions is insufficient or inaccurate.

The Investment Manager of the Master Fund may consider that the data is insufficient or inaccurate if, for example, the third-party data provider research is historic, vague, based on out of date sources, or the investment manager has other information to make them doubt the accuracy of the research.

If the Investment Manager wishes to challenge the third-party data then the challenge is presented to a cross-functional ESG Oversight Committee who must sign off on the "override" of the third-party data.

If a third party data provider does not provide research on a specific issuer or excluded activity, the Investment Manager may invest if, through its own research, it is satisfied that the issuer is not involved in the excluded activity.

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

Not applicable.

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

The Sub-Fund's policy to assess good governance practices of the investee companies shall be read in conjunction with the one of the Master Fund.

The companies in which investments are made are assessed by the Investment Manager to follow good governance practices.

The good governance practices of investee companies are assessed prior to making an investment and periodically thereafter.

The Investment Manager implements minimum standards against which investee companies will be assessed and monitored by the Investment Manager, using a combination of proprietary and/or third party data, prior to making an investment and on an ongoing basis. Such standards include, but are not limited to: sound management structures, employee relations, remuneration of staff and tax compliance.



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

**Asset allocation**  
describes the  
share of  
investments in  
specific assets.

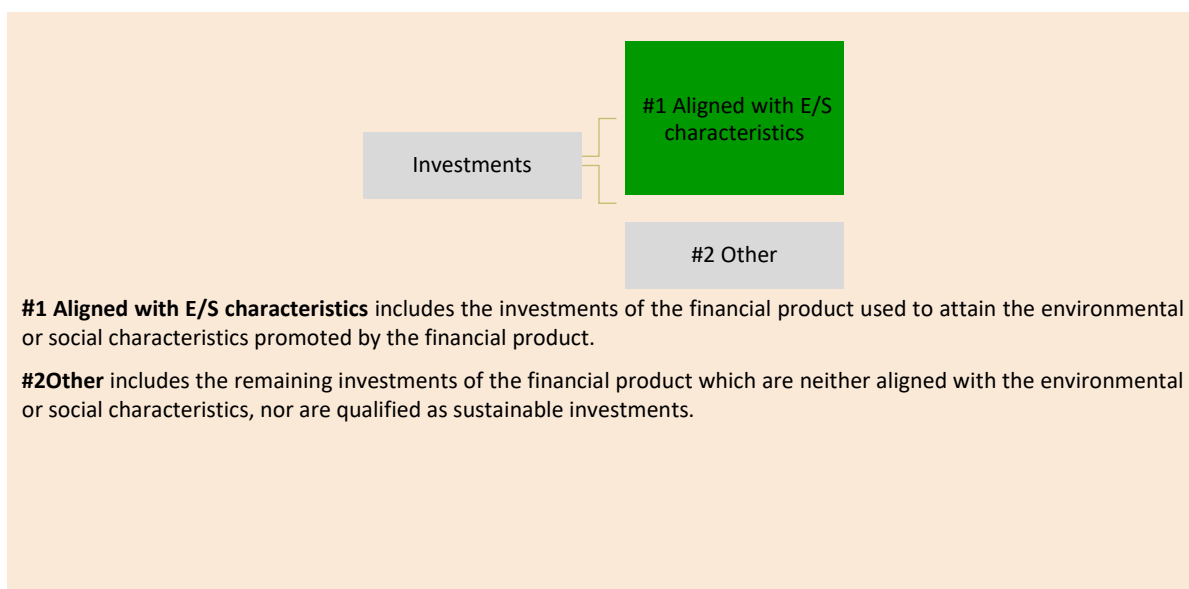
The Sub-Fund allocates at least 85% of its net assets in shares of the Master Fund which plans to invest a minimum of 80% of the investments of the financial product are used to meet the environmental or social characteristics promoted by the financial product. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will, therefore, allocate at least 68% of its assets in investments used to attain the environmental or social characteristic (#1 Aligned with E/S characteristics). The Master Fund may invest up to 20% of its total assets in other investments (#2 Other investments) not used to meet the environmental or social characteristics, which may include cash or cash equivalents, securitised assets, derivatives for the purposes of efficient portfolio management, or derivatives for investment purposes other than those used to gain exposure to direct issuers. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will, therefore, allocate up to 17% of its assets in investments not used to attain the environmental or social characteristic (#2 Other investments). The Sub-Fund will hold up to 15% in cash for ancillary liquidity purposes.



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.



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

The way the Sub-Fund uses derivatives to attain the environmental or social characteristics it promotes shall be read in conjunction with the one of the Master Fund.

The Master Fund uses derivatives to gain exposure to issuers that remain in the investment universe following the application of the exclusionary criteria described in our response to the question,

“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?”



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

The proportion of investments in the Master Fund which are aligned with the EU Taxonomy is 0%. Although the EU Taxonomy provides an ambitious framework to determine the environmental sustainability of economic activities, the EU Taxonomy does not comprehensively cover all industries and sectors, or all environmental objectives. The Investment Manager uses its own methodology to determine whether investments selected for the Master Fund are promoting environmental characteristics in accordance with the SFDR rules.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>4</sup>?**

☐ Yes:

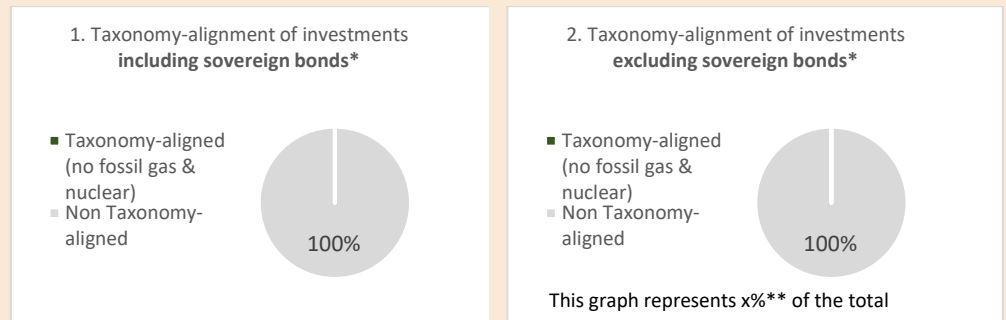
☐ In fossil gas

☐ In nuclear energy

☒ No

<sup>4</sup> 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 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

\*\* No percentage has been inserted as it is not relevant (no Taxonomy-aligned investments)

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

The Sub-Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Consequently, the Sub-Fund does not commit to a minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy, or neither to a minimum share of investments in transitional and enabling activities.



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



**What is the minimum share of socially sustainable investments?**

Not Applicable.



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

The Sub-Fund allocates at least 85% of its net assets in shares of the Master Fund which plans to invest a minimum of 80% of the investments of the financial product are used to meet the environmental or social characteristics promoted by the financial product. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will, therefore, allocate at least 68% of its assets in investments used to attain the environmental or social characteristic (#1 Aligned with E/S characteristics).

The Master Fund may invest up to 20% of its total assets in other investments (#2 Other investments)

not used to meet the environmental or social characteristics, which may include cash or cash equivalents, securitised assets, derivatives for the purposes of efficient portfolio management, or derivatives for investment purposes other than those used to gain exposure to direct issuers. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will, therefore, allocate up to 17% of its assets in investments

not used to attain the environmental or social characteristic (#2 Other investments). The Sub-Fund will hold up to 15% in cash for ancillary liquidity purposes



**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?**

Not Applicable.



**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
[www.fundinfo.com](http://www.fundinfo.com)

**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.

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

**Product name:** BPER International SICAV – Fixed Income Credit Strategies (the "Sub-Fund")

**Legal entity identifier:** 549300NTJ52YGAUQFD13

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
Yes	No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ____% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>17%</b> of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ____%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The Sub-Fund will invest at least 85% of its assets in Class X2 EUR shares of BlackRock Strategic Funds – BlackRock Sustainable Fixed Income Credit Strategies Fund (the "Master Fund"), a Sub-Fund of BlackRock Strategic Funds, a Luxembourg SICAV registered under Part I of the 2010 Law, managed by BlackRock Investment Management (UK) Limited ("BlackRock"). The Master Fund is categorised as promoting environmental and social characteristics in accordance with article 8 of the Sustainable Finance Disclosure Regulation. Via its exposure to the Master Fund, the Sub-Fund's assets are indirectly invested in assets that promote environmental and/or social characteristics. Therefore, the environmental and social characteristics of the Sub-Fund shall be read in conjunction with those of the Master Fund.

The Master Fund invests in Sustainable Investments. BlackRock defines Sustainable Investments as investments in issuers or securities that contribute to an environmental or social objective, do not significantly harm any of those objectives and where investee companies follow good governance practices. BlackRock refers to relevant sustainability frameworks to identify the alignment of the investment to environmental or social objectives.

Sustainable Investments should also meet the do no significant harm (DNSH) requirements, as defined by applicable law and regulation. BlackRock has developed a set of criteria to assess whether an issuer or investment does significant harm.

The Investment Manager will employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs as defined by the Investment Manager. The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (e.g. lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities (e.g. higher carbon emitters, issuers with certain controversial business practices, and issuers with negative ESG credentials). The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received.

The Master Fund applies the BlackRock EMEA Baseline Screens. This set of screens avoids exposures that have negative environmental outcomes by excluding direct investment in issuers that have material involvement in thermal coal and tar sands extraction, as well as thermal coal-based power generation. Negative social outcomes are also avoided by excluding direct investment in issuers involved in controversial weapons and nuclear weapons, and material involvement in production and distribution of civilian firearms and tobacco. This Master Fund also excludes issuers deemed to have failed to comply with the 10 UN Global Compact Principles, which cover human rights, labour standards, the environment, and anti-corruption. Further information on the criteria for BlackRock EMEA Baseline Screens can be found on the link disclosed in the supplement.

The Master Fund does not use a reference benchmark for the purposes of attaining the ESG characteristics that it promotes.

**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 sustainability indicators used to measure the attainment of the environmental or social characteristics of the Sub-Fund shall be read in conjunction with the one of the Master Fund.

The sustainability indicators used to measure the attainment of the environmental or social characteristics promoted by the Master Fund include:

1. The Master Fund's holdings in Sustainable Investments, as described above.
2. The Master Fund's holdings in use-of-proceeds bonds, including "green bonds",

"sustainable bonds" and "social bonds" (each as defined by BlackRock's corresponding proprietary methodology which is guided by the International Capital Markets Association Green Bond, Sustainable Bond and Social Bond Principles, respectively). The Master Fund's holdings of green, sustainable and social bonds may cause the Master Fund to gain exposure to issuers which, in turn, have exposures that are inconsistent with the exclusions described above.

3. The Master Fund's holdings in investments that are deemed to have associated positive externalities and avoidance of negative externalities as described above.
4. The Master Fund's consideration of principal adverse impacts (PAIs) on sustainability factors, as described below.
5. The Master Fund's exclusion of holdings in issuers identified by the exclusion criteria set out in the BlackRock EMEA Baseline Screens, as described above.

● ***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 Sub-Fund does not directly invest and therefore is not expected to hold sustainable investments other than indirectly via its holding in the Master Fund. The Master Fund may allocate to sustainable investments of any type, i.e. investments with an environmental objective (including Taxonomy-aligned and not), and/or a social objective. The Master Fund is not required to favour any specific type of sustainable investment.

The Master Fund invests at least 20% of its holdings in Sustainable Investments in pursuit of its investment objective. All Sustainable Investments will be assessed by the Investment Adviser to comply with BlackRock's DNSH standard outlined above.

BlackRock invests in Sustainable Investments which contribute to a range of environmental and / or social objectives which may include but are not limited to, alternative and renewable energy, energy efficiency, pollution prevention or mitigation, reuse and recycling, health, nutrition, sanitation and education and the UN Sustainable Development Goals ("Environmental and Social Objectives").

An investment will be assessed as contributing to an Environmental and/or Social Objective where:

- a) minimum proportion of the issuer's business activity contributes to an Environmental and/or Social Objective; or
- b) the issuer's business practices contribute to an Environmental and/or Social Objective; or
- c) the use of proceeds is assessed as contributing to an Environmental and/or Social Objective such as green bonds, social bonds, and sustainability bonds; or
- d) the fixed income securities are aligned with an Environmental and/or Social Objective.

● ***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?***

Sustainable Investments, made by the Master Fund, meet the DNSH requirements, as defined by applicable law and regulation. BlackRock has developed a set of criteria across all Sustainable Investments to assess whether an issuer or investment does significant harm. Investments considered to be causing significant harm do not qualify as Sustainable Investments. Further information on the above can be found on the link disclosed in the supplement.

**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?*

The indicators for adverse impacts on sustainability factors for each type of Investment, for the Master Fund, are assessed using BlackRock's Sustainable Investments proprietary methodology. BlackRock uses third-party data and/or fundamental analysis to identify investments which negatively impact sustainability factors and cause significant harm.

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

Sustainable Investments, by the Master Fund, are assessed to consider any detrimental impacts and ensure compliance with international standards of 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. Issuers deemed to have violated these conventions are not considered as Sustainable Investments.

*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, the manner in which the Sub-Fund considers adverse impacts on sustainability factors shall be read in conjunction with that of the Master Fund.



The Master Fund considers PAIs on sustainability factors through the application of the BlackRock EMEA Baseline Screens, its exclusionary policy and its holdings in green bonds.

The Master Fund takes into account the following PAIs:

- GHG emissions
- GHG intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Energy consumption intensity per high impact climate sector
- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

In addition, the Master Fund takes into account the PAIs through BlackRock's DNSH standard for Sustainable Investments. The Master Fund will provide information on the PAIs in its annual report.

☐ 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 Sub-Fund will invest at least 85% of its net assets in units of the Master Fund, and as such the investment strategy of the Sub-Fund shall be read in conjunction with the one of the Master Fund.

The Master Fund seeks to maximise total return in a manner consistent with the principles of environmental, social and governance “ESG” focused investing. The Master Fund seeks to reduce its carbon emissions profile by allocating to green bonds, lower carbon emitting issuers and issuers committed to decarbonisation. The Master Fund seeks to invest in Sustainable Investments, including, but not limited to, “green bonds” (as defined by its proprietary methodology which is guided by the International Capital Markets Association Green Bond Principles), and its total assets will be invested in accordance with the ESG Policy described below.

The Master Fund will apply the BlackRock EMEA Baseline Screens.

The Investment Manager will also employ a proprietary methodology to assess investments based on the extent to which they are associated with positive or negative externalities, that is environmental and social benefits or costs as defined by the Investment Manager. The Investment Manager will seek to enhance exposure to investments that are deemed to have associated positive externalities (i.e. lower carbon emitting issuers and issuers with positive ESG credentials) and seek to limit exposure to investments that are deemed to have associated negative externalities including limiting direct investment in securities of issuers involved in the ownership or operation of gambling related and production of adult entertainment materials.

The assessment of the level of involvement in each activity may be based on percentage of revenue, a defined total revenue threshold, or any connection to a restricted activity regardless of the amount of revenue received. The remaining issuers (i.e. those issuers which have not yet been excluded from investment by the Master Fund) are then evaluated by the Investment Adviser based on, among other factors, their ability to manage the risks and opportunities associated with ESG compliant business practices and their ESG risk and opportunity credentials, such as their leadership and governance framework, which is considered essential for sustainable growth, their ability to strategically manage longer-term issues surrounding ESG and the potential impact this may have on an issuer’s financials. The Master Fund may gain limited indirect exposure (through, including but not limited to, derivatives and shares or units of CIS) and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide to issuers with exposures that do not meet the ESG criteria described above.

● ***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?***

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

The binding elements of the investment strategy of the Sub-Fund shall be read in conjunction with those of the Master-Fund. The Master-Fund’s binding elements of the investment strategy are as follows:

1. Maintain that the Master Fund holds at least 20% in Sustainable Investments.
2. Enhancing exposure to investments that are deemed to have associated positive externalities while limiting investments that are deemed to have associated negative externalities.
3. Apply the BlackRock EMEA Baseline Screens.

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

Not applicable.

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

The Sub-Fund's policy to assess good governance practices of the investee companies shall be read in conjunction with the one of the Master Fund. The Master Fund's Investment Manager operates a data driven quantitative good governance test used to consider investments into companies. BlackRock assesses good governance practices of the investee companies by combining proprietary insights and shareholder engagement by the Investment Manager, with data from external ESG research providers. BlackRock uses data from external ESG research providers to initially identify issuers which may not have satisfactory governance practices in relation to key performance indicators (KPIs) related to sound management structure, employee relations, remuneration of staff and tax compliance.

Where issuers are identified as potentially having issues with regards to good governance, the issuers are reviewed to ensure that, where the Investment Adviser agrees with this external assessment, the Investment Manager is satisfied that the issuer has either taken remediation actions or will take remedial actions within a reasonable time frame based on the Investment Manager's direct engagement with the issuer. The Investment Manager may also decide to reduce exposure to such issuers.



**Asset allocation** describes the share of taxonomy-aligned activities are expressed as a share of:

**turnover** reflecting the share of revenue from green activities of investee companies

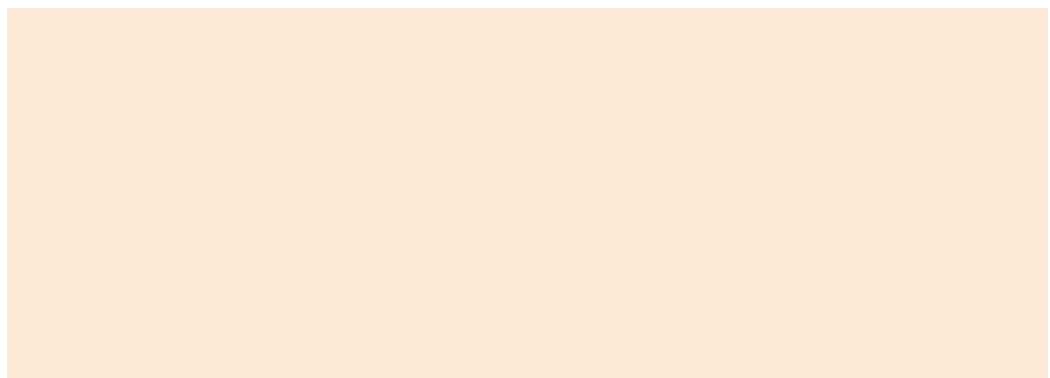
**capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

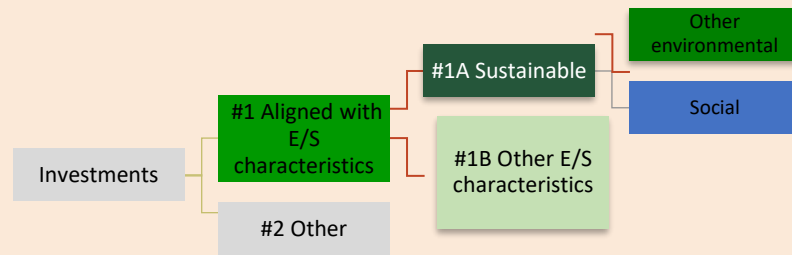
**operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

The Sub-Fund allocates at least 85% of its net assets in shares of the Master Fund which plans to invest a minimum of 70% of its assets to attain the environmental and/or social characteristics promoted. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will, therefore, allocate at least 59,5% of its assets in investments used to attain the environmental or social characteristic (#1 Aligned with E/S characteristics). Of these investments, a minimum of 20% of the Master Fund's total assets will be invested in Sustainable Investments (#1A Sustainable), and the remainder will be invested in investments aligned with other environmental and/or social characteristics described above (#1B Other E/S characteristics). Considering that the Master Fund will invest at least 20% in Sustainable Investments the Sub-Fund will allocate at least 17% in Sustainable Investments.

The Master Fund may invest up to 30% of its total assets in other investments (#2 Other investments).





**#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 way the Sub-Fund uses derivatives to attain the environmental or social characteristics it promotes shall be read in conjunction with the one of the Master Fund. The Master Fund may use derivatives for investment purposes and for the purposes of efficient portfolio management. For derivatives, any ESG rating or analyses referenced above will apply only to the underlying investment.



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

The Master Fund (and accordingly the Sub-Fund) does not currently commit to investing more than 0% of its assets 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<sup>5</sup>?**

<sup>5</sup> 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.

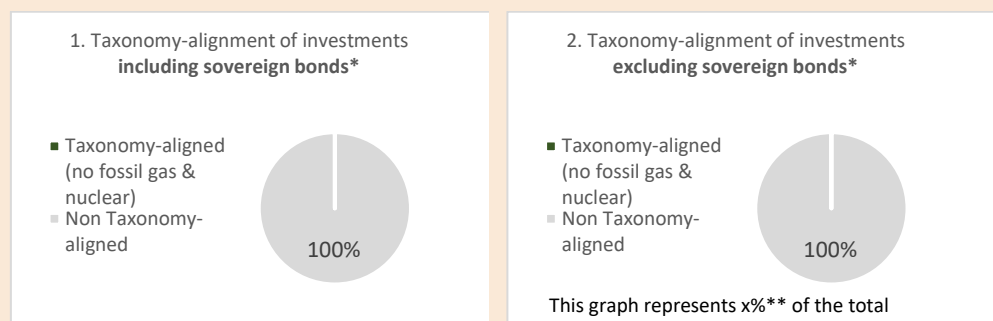
the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.

- ☐ 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

\*\* No percentage has been inserted as it is not relevant (no Taxonomy-aligned investments)

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

As the Master Fund (and accordingly the Sub Fund) does not commit to making investments in transitional and enabling activities, however, these investments may form part of the portfolio of the Master Fund.



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?**

Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will therefore, allocate at least 17% of its assets in Sustainable Investments.

As noted above, these Sustainable Investments will be a mix of Sustainable Investments with an environmental objective that is not aligned with the EU Taxonomy or a social objective or a combination of both, and the exact composition may fluctuate.

The Master Fund invests in Sustainable Investments that are not aligned with the EU Taxonomy for the following reasons: (i) it is part of the investment strategy of the Master Fund; (ii) data to determine EU Taxonomy-alignment may be unavailable; and / or (iii) underlying economic activities may not be eligible under the EU Taxonomy's available technical screening criteria or may not comply with all requirements set out in such technical screening criteria.



### **What is the minimum share of socially sustainable investments?**

The Sub-Fund allocates at least 85% of its net assets in shares of the Master Fund which plans to invest at least 20% of its assets in Sustainable Investments with an environmental objective that is not aligned with the EU taxonomy or a social objective or a combination of both, and the exact composition may fluctuate. Given that the Sub-Fund will invest at least 85% of its net assets in shares of the Master Fund, the Sub-Fund will therefore, allocate at least 17% of its assets in with an Sustainable Investments with an environmental objective or a social objective or a combination of both, and the exact composition may fluctuate.

As noted above, the Sustainable Investments will be a mix of Sustainable Investments with an environmental objective that is not aligned with the EU Taxonomy or a social objective or a combination of both, and the exact composition may fluctuate. The Master Fund invests in Sustainable Investments that are not aligned with the EU Taxonomy for the following reasons: (i) it is part of the investment strategy of the Fund; (ii) data to determine EU Taxonomy-alignment may be unavailable; and / or (iii) underlying economic activities may not be eligible under the EU Taxonomy's available technical screening criteria or may not comply with all requirements set out in such technical screening criteria.



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

The Master Fund's other holdings are limited to 30% and may include derivatives, cash and near cash instruments and shares or units of CIS and fixed income transferable securities (also known as debt securities) issued by governments and agencies worldwide.

These investments may be used for investment purposes in pursuit of the Master Fund's (non ESG) investment objective, for the purposes of liquidity management and/or hedging.

No other holdings are considered against minimum environmental or social safeguards.



**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?**

Not applicable



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