

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

Sustainable

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

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

Product name: (LF) Fund of Funds – ESG Focus

Legal entity identifier: 213800VBMFPJQJJ983

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective**: ___%



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



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



It will make a minimum of **sustainable investments with a social objective**: ___%



It **promotes Environmental/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?

(LF) Fund of Funds – ESG Focus (the “Sub-Fund”) investment strategy combines total return with equal focus on environmental, social and governance (ESG) factors, ensuring a tilt to responsible investing. To achieve this, the Sub-Fund will follow a flexible allocation strategy and invest at least 80% of its net assets in underlying funds that meet the ESG factors promoted by the Sub-Fund.

The environmental and social characteristics promoted include:

1. A lower fossil fuel involvement as a contribution to save Earth from global warming
2. A positive contribution to the disruption of proliferation of controversial weapons
3. Adherence to and conducting business activities in accordance with the United Nations Global Compact (UNGC) and/or the OECD Guidelines for Multinational Enterprises

For the purpose of measuring the achievement of ESG characteristics described above particularly 1 & 2, the Sub-Fund will make ex-post comparisons with the indices selected for such purpose only, namely “MSCI All Country World index” and/or “Morningstar Global TME Index”.

However, the Sub-Fund is actively managed and does not replicate any index for the purpose of attaining the promoted environmental or social characteristics.

The Sub-Fund does not seek to invest in sustainable investments as defined by the EU Taxonomy Regulation, i.e. the investments do not take into account the EU criteria for environmentally sustainable economic activities.

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 Sub-Fund uses the following sustainability indicators in order to measure the attainment of the environmental or social characteristics promoted:

1. Level 2 exclusion criteria of the “Responsible Investment Policy” established by the Investment Manager:

ACTIVITY/CRITERIA	REVENUE THRESHOLD
FOSSIL FUELS	
Thermal coal extraction	>30%
Thermal coal power generation	>30%
Oil sands extraction	>30%
Shale energy extraction	>30%
Off-shore arctic oil & gas exploration	>20%
WEAPONS	
Involvement in Controversial Weapons (i.e. chemical and biological weapons, incendiary weapons, nuclear weapons)	>0%
Small Arms Civilian Customers (Assault Weapons)	>10%
COMPANIES and COUNTRIES	

Direct investment in companies in severe breach of UN Global Compact Principles on human rights, labor standards, environmental protection and anti-corruption 0%

Direct investment in countries subject to hard sanctions by Switzerland, the European Union and the US Office of Foreign Assets 0%

The Sub-Fund's investments in underlying funds that fail to meet the Level 2 exclusion criteria are residual (i.e. equal or below 10% of the net assets of the Sub-Fund) as they are not aligned with the E/S characteristics promoted by the Sub-Fund.

2. The "Portfolio Corporate Sustainability Score": The Morningstar® "Portfolio Corporate Sustainability Score" is an asset-weighted average calculated by Morningstar.

The Sub-Fund aims at having a better Portfolio Corporate Sustainability Score compared to "MSCI All Country World index" and/or "Morningstar Global TME Index", selected for comparison purposes only.

3. The Morningstar "Sustainability Rating": Morningstar® assigns a "Sustainability Rating" by ranking all scored funds within a Morningstar "Global Category".

Percent Rank Rating Depiction

- i. Top 10% High
- ii. Next 22.5% Above Average
- iii. Next 35% Average
- iv. Next 22.5% Below Average
- v. Bottom 10% Low

The Sub-Fund aims at a Morningstar Sustainability Rating of "Above Average" or better.

4. The "Low Carbon Designation™" as assigned by Morningstar: The Morningstar® Low Carbon Designation™ is assigned to portfolios that have low carbon-risk scores and low levels of fossil fuel exposure.

To receive the designation, a fund must have a 12-month average Portfolio Carbon Risk Score below 10 and a 12-month average Fossil Fuel Involvement of less than 7% of its net assets.

The Sub-Fund retains a Low Carbon Designation™ assigned by Morningstar.

- ***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

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

Not applicable

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

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 Sub-Fund follows a flexible allocation strategy. As such, it may differentiate its risk profile under different market conditions by changing the percentage of assets invested in equity and/or fixed income UCITS.

The Sub-Fund's investment process is based on E/S integration, primarily when investing in underlying funds that have a pure equity, fixed income/bond or flexible allocation strategies.

Each target fund is weighted with the help of the internal fund selection and evaluation process that also takes into account ESG/sustainability scores from Sustainalytics as provided by Morningstar. When allocation in fixed-income UCITS is deemed necessary as part of the flexibility clause the Investment Manager will use mainly Article 8 & Article 9 UCITS funds with well demonstrated E/S characteristics. The later may not apply when selecting money market instruments and/or other short term liquidity UCITS.

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

1. Exclusion criteria as per Level 2 of the Investment Manager's Responsible Investment Policy: only 10% of the net assets of the Sub-Fund may fail to meet such exclusion criteria.
2. The Sub-Fund's investments in each equity or fixed income underlying funds which are not categorised as either article 8 or 9 SFDR may not exceed 5% of its net assets.
3. The Sub-Fund invests only in underlying funds that rank on the top 60% of the "Portfolio Corporate Sustainability Score", within their assigned peer group:
 - a. Underlying funds that have a pure equity strategy are divided among 4 groups: global, thematic, US/North America, Europe;
 - b. Underlying funds that have a fixed/income or bond strategy are divided among 2 groups: aggregate, corporate;
 - c. Underlying funds that have a flexible allocation strategy (one single group).
4. The Sub-Fund's percentage of net assets with severe controversies may not exceed 1%. (weighted average of underlying funds' percent of AUM with "Severe Controversies" as measured by Morningstar).
5. The Sub-Fund's relevant Morningstar "Sustainability Rating" is aimed to be at least "above average".
6. The Sub-Fund aims to retain a "Low Carbon Designation™" assigned by Morningstar.
7. The Sub-Fund's aims to have a lower "Morningstar® Portfolio Fossil Fuel Involvement™" percentage compared to its Morningstar category or a more generic category if the former is not available.

● ***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?***

Being a fund of funds, the Sub-Fund does not have a direct relationship with the investee companies. However, it encourages the underlying funds' managers to engage with the corporates they invest in in adherence with the E/S characteristics promoted by the Sub-Fund.

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.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

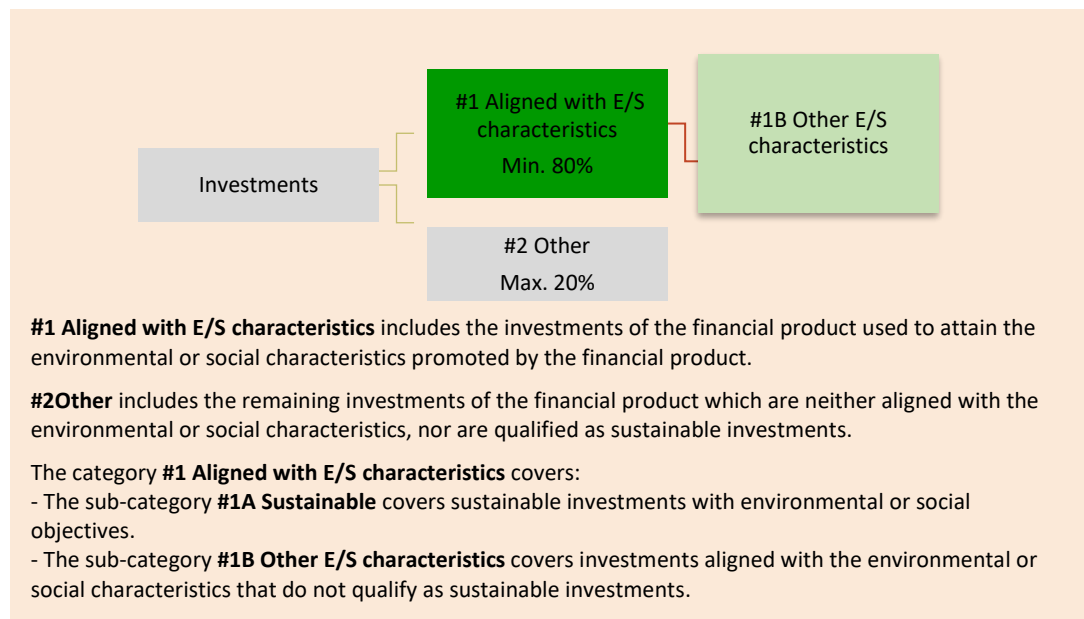
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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

What is the asset allocation planned for this financial product?

The Sub-Fund pursues a flexible allocation strategy. As such, it may differentiate its risk profile under different market conditions by changing the percentage of assets invested in equity and/or fixed income UCITS.

The Sub-Fund invests at least 80% of its net assets (but aims at a significantly higher proportion) in article 8 and article 9 SFDR UCITS aligned with the E/S characteristics promoted by the ESG approach of the Sub-Fund (#1). The Sub-Fund may not invest more than 5% of its net assets in any UCITS that does not meet art. 8 or art. 9 SFDR requirements.

Due to the actively managed flexible allocation strategy followed by the Sub-Fund, the asset allocation may vary. However, the Sub-Fund will not invest more than 20% of its net assets in money market and/or other short term liquidity UCITS that are not aligned with the ESG characteristics promoted (#2 Other).



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

The Sub-Fund does not use derivatives to attain the environmental and social characteristics promoted.



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

The Sub-Fund does not commit to invest a minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy. Therefore, the minimum percentage of environmentally sustainable investments aligned with the EU Taxonomy is 0% of the Sub-Fund's net assets.

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

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.

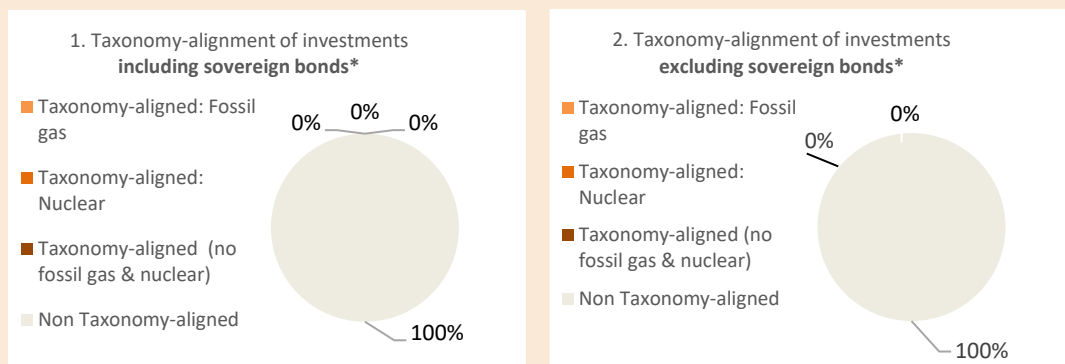
are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy²?**

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

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



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

● **What is the minimum share of investments in transitional and enabling activities?**
Not applicable

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

Not applicable

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?

² 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.

This Sub-Fund promotes a predominant asset allocation in investments that are aligned with environmental and social characteristics (#1 Aligned with E/S characteristics). In addition, this Sub-Fund will invest into investments that are not considered aligned with the promoted characteristics (#2 Other). In line with the market positioning of this Sub-Fund, the purpose of these remaining investments is to provide investors with an exposure to non-ESG aligned investments while at the same time ensuring a predominant exposure to environmentally and socially aligned investments. Remaining investments can be used by the portfolio management for performance, diversification, liquidity and hedging purposes.

No minimum environmental or social criteria are applied to these investments. However, such Other investments do respect the exclusion criteria set by the Investment Manager unless they are money market UCITS, cash, time deposits or equivalent financial instruments used for liquidity management.



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

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

The reference index used for relative VaR computation is not consistent with the E/S characteristics promoted by the Sub-Fund.

In addition, the Sub-Fund aims at having a better Portfolio Corporate Sustainability Score than the indices “MSCI All Country World Index” and/or “Morningstar Global TME Index” (comparison ex post) in each relevant E/S characteristic.

However, the Sub-Fund is actively managed and does not replicate any index for the purpose of attaining the promoted environmental or social characteristics.

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

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website http://www.eurobankam.gr/sites/default/files/esg_focus_investment_process_f.pdf

http://www.eurobankam.gr/sites/default/files/downloads/responsible_investment_policy_final.pdf

