

**SFDR APPENDIX**

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

**Product name:** EdR SICAV - Euro Sustainable Credit

**Legal entity identifier:** 969500QSX84NZ2QO7031

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

At least \_\_\_% of its investments will be **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

At least \_\_\_% of the investments will be **sustainable investments with a social objective:**

It **promotes Environmental and Social (E/S) characteristics** and, while it does not have sustainable investment as its objective, at least **50%\*** of its investments will be 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**

\*As a percentage of the UCITS' net assets.

**A description of the sustainable investment methodology defined by Edmond de Rothschild Asset Management (France) is available on the management company's website:**

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/Responsible-investment/OUR%20ENGAGEMENT/FR/EdRAM-Definition-et-methodologie-Investissement-durable.pdf>

### Sustainable investment

is defined as an investment in an economic activity that contributes to an environmental or social objective, provided that it does not cause significant harm to either of these objectives and that the investee companies apply good governance practices.

The **EU Taxonomy** is a classification system introduced in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. The 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 Sub-fund promotes environmental and social characteristics identified with our ESG (Environmental, Social and Governance) analysis model, such as, in particular:

- Environment: environmental management strategy, energy consumption, greenhouse gas emissions, water, waste, pollution, green impact
- Social: job quality, human resources management, social impact, stakeholder relations, health and safety.

No benchmark has been designated for the purposes of achieving the environmental or social characteristics promoted by the Sub-fund.

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

Managers have access to portfolio monitoring tools, providing climate and ESG indicators, such as the carbon footprint or temperature of the portfolio, exposure to the various United Nations Sustainable Development Goals (SDGs), as well as the environmental and social ratings of investments. Our tools provide a consolidated view of the portfolio as well as an issuer-by-issuer analysis. Our ESG analyses, whether internal or provided by external providers, also assign a score to each of the environmental and social themes promoted by the sub-fund and are available to managers.

In compliance with SRI Label requirements, the fund undertakes to outperform the benchmark/initial scope for the following two adverse impact sustainability indicators:

- Investee companies' Greenhouse Gas Emission (GGE) intensity (PAI 3)
- Activities that have an adverse impact on biodiversity-sensitive areas: share of investments in companies with sites/establishments located in or near biodiversity-sensitive areas, if such companies' activities have an adverse impact on these areas (PAI 7).

### ● **What are the objectives of the sustainable investments that the financial product intends to make, and how do the investments contribute to these objectives?**

Sustainable investments are considered to be investments in (i) companies that make a positive contribution towards achieving an environment or social objective, (ii) companies that positively activate at least one of the United Nation's Sustainable Development Goals (SDGs), with a minimum activation threshold of  $\geq 2.5/10$  (source: MSCI), provided they comply with DNSH and good governance requirements.

For further information, please refer to the following document: <https://www.edmond-de-rothschild.com/media/vomhax5n/edram-definition-et-methodologie-investissement-durable.pdf>

**Sustainability indicators** are used to verify whether the financial product complies with the environmental or social characteristics promoted by the financial product.

**Principal adverse impacts**

correspond to the most significant negative impacts of investment decisions on sustainability factors related to environmental, social and employee issues, respect for human rights and the fight against corruption and bribery.

***How do the sustainable investments that the financial product intends to make not cause significant harm to any environmentally or socially sustainable investment objectives?***

We ensure that the sustainable investments made by the sub-fund do no significant harm to a sustainable investment objective, in particular by:

- (1) applying the Edmond de Rothschild Asset Management (France) exclusion policy, which encompasses controversial weapons, tobacco, thermal coal, palm oil and non-conventional fossil fuels. Furthermore, the Sub-fund will refrain from investing in any company, project or activity in any of the sectors that are excluded by the SRI Label, in compliance with the Edmond de Rothschild Asset Management (France) exclusion policy, which can be found at <https://am.edmond-de-rothschild.com/media/u5yfaxyc/edram-fr-politique-exclusion.pdf>. In addition, when they are not already covered by internal policies, the sub-fund applies the exclusions mentioned in Article 12(1)(a-g) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 regarding minimum standards for EU "Climate Transition" Benchmarks and EU "Paris Agreement" Benchmarks (commonly referred to as the "Paris-Aligned Benchmarks" (PABs)). These exclusions cover oil fuels, gaseous fuels, and electricity generation, among others.
- ensuring that we do not invest in companies that violate the UN Global Compact<sup>1</sup>.
- (ii) Moreover, in accordance with the SRI Label requirements, the worst ESG ratings (25% of the investment universe as of 01/01/2025, then 30% as of 01/01/2026) are excluded, as are the most severe controversies, thus limiting any adverse impacts.

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

Adverse impact indicators, and in particular the PAI indicators presented in Annex 1, Table 1 of the SFDR RTS, are taken into account as part of the Sub-Fund's investment process and our ESG rating model, and are also included in our definition of sustainable investment (see the description of the sustainable investment methodology available on the website). They are integrated into the portfolio monitoring tools and checked by the Management team and the Risk Department.

Moreover, in accordance with the SRI Label requirements, the worst ESG ratings (25% of the investment universe as of 01/01/2025, then 30% as of 01/01/2026) are excluded, as are the most severe controversies, thus limiting any adverse impacts.

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

Managers select sustainable investments in accordance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights by excluding companies that violate the principles of the UN Global Compact.<sup>1</sup>

<sup>1</sup> UN Global Compact: A United Nations initiative launched in 2000 to encourage companies around the world to adopt a socially responsible attitude by committing to implement and promote several principles relating to human rights, international labour standards, the environment and anti-corruption.

*The EU Taxonomy sets out a "do no significant harm" principle, which provides that Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives. The Taxonomy also contains specific EU criteria.*

*The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the Union 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.*

*All other sustainable investments must also do no significant harm to environmental or social objectives.*



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

X

Yes, the Sub-fund takes into account the principal adverse impacts on sustainability factors by first applying the Edmond de Rothschild Asset Management (France) exclusion policy, particularly concerning thermal coal and controversial weapons. The principal adverse impacts are also taken into account as part of the issuer ESG analysis model, whether this analysis is performed internally or by external providers, and impact the environmental and social scores as well as the overall ESG rating<sup>1</sup>.

In accordance with Article 11 of Regulation (EU) 2019/2088, known as the "SFDR", the Sub-fund's periodic reports, which describe the extent to which environmental or social characteristics are respected in particular, are available on the website [www.edmond-de-rothschild.com](http://www.edmond-de-rothschild.com), under "Fund Center".

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No



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

The sub-fund's ESG strategy aims to identify investment opportunities by identifying companies with a positive environmental or social impact and good non-financial performance. It also aims to detect non-financial risks that could materialize from a financial point of view.

For this purpose, the Sub-fund uses an internal ESG rating or an ESG rating from an external rating agency, combined with negative screening based on an exclusion list created by the management company, available on its website.

ESG criteria are taken into account at each stage of the investment process, first by defining an eligible universe (by eliminating 25% of the universe with the lowest ESG ratings as of 01/01/2025, then 30% as of 01/01/2026), then by performing an ESG analysis for each security, sometimes involving an active dialogue and engagement process.

The use of derivatives for exposure, other than marginally for effective management, should be temporary and exceptional.

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

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

At any point in time, at least 90% of portfolio companies will have either an internal ESG rating or a rating provided by an external rating agency.

Once this process has been applied, the investment scope will be reduced by at least 25% as of 01/01/2025, then by 30% as of 01/01/2026, by eliminating the poorest non-financial ratings using a best-in-universe approach.

Furthermore, the securities selection process also includes negative screening, which involves excluding (i) companies that contribute to the production of controversial weapons, in compliance with international agreements in this field, (ii) companies exposed to activities related to thermal coal, tobacco, palm oil and non-conventional fossil fuels, and (iii) companies that violate one of the 10 principles of the United Nations Global Compact (UNGC), in accordance with the Edmond de Rothschild Asset Management (France) exclusion policy, which is available on its website. This negative screening process helps mitigate sustainability risk. Furthermore, the Sub-fund will refrain from investing in any company, project or activity in any of the sectors that are excluded by the SRI Label, in compliance with the Edmond de Rothschild Group's exclusion policy, which can be found at <https://am.edmond-de-rothschild.com/media/u5yfaxyc/edram-fr-politique-exclusion.pdf>. In addition, when they are not already covered by internal policies, the sub-fund applies the exclusions mentioned in Article 12(1)(a-g) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 regarding minimum standards for EU "Climate Transition" Benchmarks and EU "Paris Agreement" Benchmarks (commonly referred to as the "Paris-Aligned Benchmarks" (PABs)). These exclusions cover oil fuels, gaseous fuels, and electricity generation, among others.

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

The Sub-fund undertakes to reduce the scope of the investments considered by 25% as of 01/01/2025, then 30% as of 01/01/2026, prior to applying its investment strategy.

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

Good governance practices are assessed through a comprehensive analysis of the governance pillar as part of the issuer's ESG analysis as well as through the consideration of controversies affecting the issuer. A minimum governance score, provided by our internal ESG analysis or the ESG analysis from an external provider, is applied to the sub-fund's sustainable investments.

#### **Good governance**

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

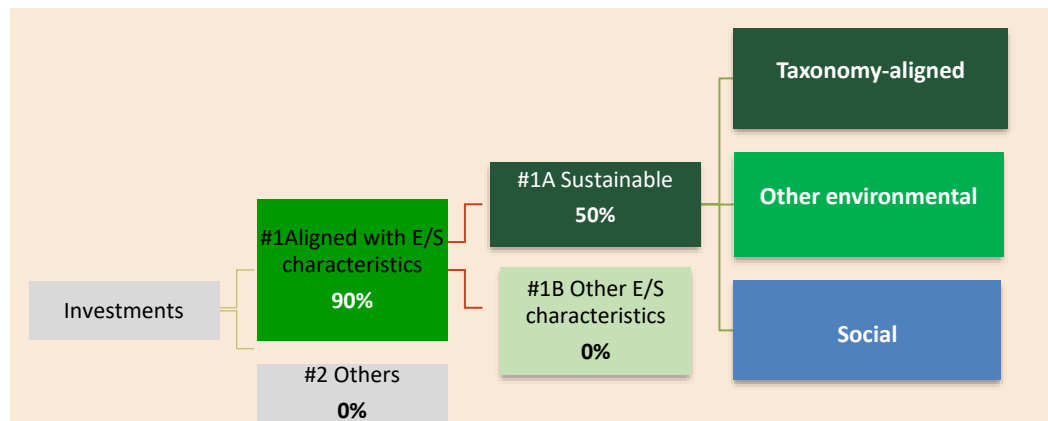


## What is the expected asset allocation for this financial product?

At least 90% of the financial product's net assets will be invested in assets that were considered "eligible" based on the current ESG process – i.e. in assets that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics).

At least 50% of the financial product's net assets will be invested in assets that were considered to be sustainable investments (#1A Sustainable).

A detailed description of this financial product's asset allocation can be found in the product's prospectus.



Category **#1 Aligned with E/S Characteristics** includes financial product investments used to achieve the environmental or social characteristics promoted by the financial product.

#2 Others includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments. This includes investments for hedging purposes and cash held as ancillary liquidity.

Category **#1 Aligned with E/S Features** includes:

- subcategory **#1A Sustainable** covering sustainable investments with environmental or social objectives;
- subcategory **#1B Other E/S characteristics** covering investments aligned with environmental or social characteristics that are not considered sustainable investments.

Edmond de Rothschild Asset Management (France) makes use of a proprietary ESG analysis model, known as "EDR BUILD" (Bold, Universal, Innovation, Long Term and Differentiation). This rating model takes the concept of double materiality into account:

- With a view to prioritising the best performing companies, regardless of financial rating, size or sector, using a best-in-universe approach.
- With ESG criteria being assigned different weightings based on sector of activity and the specific challenges facing each sector. In other words, the various non-financial criteria are assigned greater or lesser weightings depending on the sector being considered, which means that each of the three pillars will have a different weighting.
- The weightings are more or less balanced across the three pillars, with each pillar ultimately having a weighting of at least 20%. As such, the weighting of the "E" pillar will vary between 20%, for sectors with the least impact on the environment, and 38% for sectors with the

highest impact. The weighting of the "S" pillar will vary between 29% and 43%, and that of the "G" pillar, between 31% and 42%. Exceptionally, in 2025, the weighting of the "E" pillar may vary between 15 and 20%.

Further details on the weightings assigned to the E, S and G pillars can be found in the Transparency Code at <https://am.edmond-de-rothschild.com/media/ibugyryl/edram-fr-code-de-transparence.pdf>

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

Only single-name derivatives are used to attain the environmental or social characteristics promoted by the financial product.

If the issuer of the product underlying the derivative has an ESG rating (internal or external), the derivative is taken into account when calculating the percentage of investments aligned with E/S characteristics, or when determining the fund's average ESG rating, or as part of a promoted selectivity approach. When calculating the share of sustainable investments in the fund, only single-name derivatives with long exposures are taken into account, after considering the compensatory effects of short positions and the underlying securities held.

In order to comply with the EU Taxonomy, the criteria for **fossil fuels** include emission limits and the switch to renewable electricity or low-carbon fuels by the end of 2035. As regards **nuclear energy**, the criteria include comprehensive rules on nuclear safety and waste management.

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

**Transitional activities** are those for which low-carbon alternatives do not yet exist and, among other things, whose greenhouse gas emission levels are on a par with the best achievable performance.



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

● **Has the financial product invested in EU Taxonomy-compliant fossil fuels and/or nuclear energy activities? <sup>2</sup>**

Yes

In fossil fuels

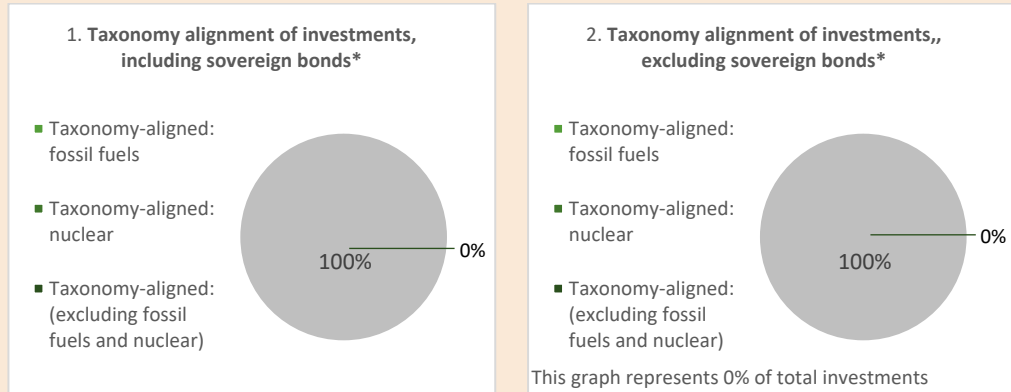
In nuclear energy

No

Given the current level of non-financial information provided by companies, we are not able at this stage to accurately identify and convey the underlying investments inherent in EU Taxonomy-compliant fossil fuel and/or nuclear energy activities.

<sup>2</sup> Fossil-fuel and/or nuclear activities will only comply with the EU Taxonomy if they contribute to climate change mitigation and do no harm to any objective of the EU Taxonomy - see explanatory note in the left margin. All the criteria applicable to economic activities in the fossil fuel and nuclear energy sectors that comply with the EU Taxonomy are set out in Commission Delegated Regulation (EU) 2022/1214.

**In the two graphs below, the minimum percentage of EU Taxonomy-aligned investments is shown in green. As there is no appropriate methodology to determine the Taxonomy alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment of all of the financial product's investments taken together, including sovereign bonds, while the second graph shows the Taxonomy alignment of all of the financial product's investments, excluding sovereign bonds.**



**\* For the purposes of these charts, "sovereign bonds" include all sovereign exposures.**

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

Not applicable.



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

The minimum share of sustainable investments with an environmental object that are not aligned with the EU Taxonomy is 0%.



**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?**

Category #2 "Others" includes the investments that are neither aligned with environmental or social characteristics, nor considered sustainable investments. This includes investments for hedging purposes and cash held as ancillary liquidity.



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



**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?**

No benchmark has been designated for the purposes of achieving the environmental or social characteristics promoted by the Sub-fund.

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

Not applicable

- *How is the alignment of the investment strategy with the benchmark's methodology 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

**Benchmarks** are indices used to measure whether or not a financial product achieves the environmental or social characteristics it promotes.



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

More product-specific information can be found on the website:

<https://funds.edram.com/funds-list>