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

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.

Product name: EdR SICAV - Millesima Select 2028
Legal entity identifier: 969500KASITM0U6K7L83

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	[x] **No**
☐ At least ___% of the investments will be **sustainable investments with an environmental objective:**	[x] It **promotes Environmental/Social (E/S) characteristics** and although sustainable investment is not an objective, at least **20%*** of its investments will be sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective, in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective, in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ At least ___% of the investments will be **sustainable investments with a social objective:**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

The **EU Taxonomy** is a classification system 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.

*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 website of the management company:
https://www.edmond-de-rothschild.com/SiteCollectionDocuments/Responsible-investment/OUR%20ENGAGEMENT/FR/EdRAM-Definition-et-methodologie-Investissement-durable.pdf

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

The Sub-fund promotes environmental and social characteristics identified using 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.

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

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.

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.

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 ≥ 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/SiteCollectionDocuments/Responsible-investment/OUR ENGAGEMENT/FR/EdRAM-Definition-et-methodologie-Investissement-durable.pdf

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

When making sustainable investments for the sub-fund, care is taken to ensure that they do not cause significant harm to a sustainable investment objective. This is achieved by applying the Edmond de Rothschild Asset Management (France) exclusion policy, which encompasses prohibited weapons, tobacco, palm oil, thermal coal, and unconventional fossil fuels, as well as companies that violate international standards, such as those established by the Organisation for Economic Co-operation and Development (OECD), the International Labour Organization (ILO), and the United Nations Global Compact (UNGC)[1].

[1] 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.

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.

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 any company that violates the principles of the International Labour Organization (ILO) and the UN Global Compact.

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 firstly by applying the Edmond de Rothschild Asset Management (France) exclusion policy, especially where thermal coal and prohibited weapons are concerned. 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. 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, under “Fund Center”.

[-] 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 provided by an external rating agency, combined with negative screening based on an exclusion list, which is established by the management company and available on its website.

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?

In the portfolio, at least 90% of debt securities and money market instruments with an investment-grade credit rating, and 75% of debt securities and money market instruments with a high-yield credit rating, have an ESG rating. This rating is either a proprietary ESG rating, or a rating provided by an external non-financial data provider. These two ratios are expressed in terms of the capitalisation of the UCITS' net assets.

At the end of this process, the sub-fund has a higher ESG rating than that of its investment universe.
The securities selection process also includes negative screening, which involves excluding (i) companies that contribute to the production or sale of prohibited weapons, in compliance with international agreements in this field, (ii) companies exposed to activities related to thermal coal, unconventional fossil fuels, tobacco, and palm oil, and (iii) companies that violate international standards – such as those established by the Organisation for Economic Co-operation and Development (OECD), the International Labour Organization (ILO), and 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.

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

What is the minimum share that the financial product is committed to reducing its investment scope by before applying this investment strategy?

The sub-fund does not undertake to respect a committed minimum rate to reduce the scope of the investments considered prior to the application of the investment strategy.

What is the policy for assessing investee companies' good governance practices?

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.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a percentage of:

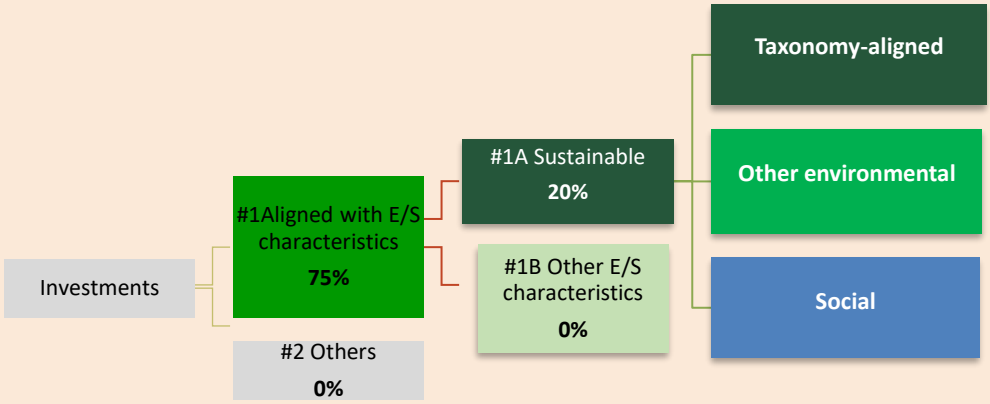
- **turnover**, to reflect the share of revenue from investee companies' green activities;

- **capital expenditure (CapEx)**, to reflect investee companies' green investments, e.g. for a transition to a green economy;

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

What is the expected asset allocation for this financial product?

At least 75% 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 20% of the financial product's net assets will be invested in assets that were considered to be sustainable investments (#1A Sustainables).
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.

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.

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

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.

Has the financial product invested in EU Taxonomy-compliant fossil fuels and/or nuclear energy activities? [2]

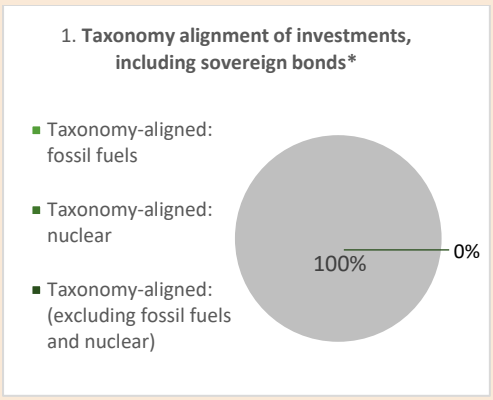
☐ Yes

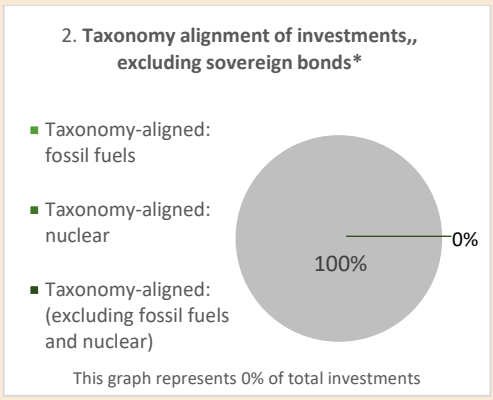
☐ In fossil fuels ☐ In nuclear energy

☒ 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.

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.

2 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.

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.

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.

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

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

Where can I find more product-specific information online?

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

http://funds.edram.com