# ANNEX IV

Periodic 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		Product name:		Comgest Growth Europe Opportunities	ide	gal entit ntifier:	у	635400MA8NHPUJPAJD89	
means an investment in an economic activity that contributes to an environmental or social		Environmental and/or social characteristics							
objective, provided that the investment does not significantly harm any		Did this financial product have a sustainable investment objective?							
environmental or social		••	☐ Yes				⊠ No	0	
objective and that the investee companies follow good governance practices.				de <b>sustainable i</b> r an environmenta			charac while it sustain	cteristic did not nable inv	nvironmental/Social (E/S) s and have as its objective a restment, it had a proportion ustainable investments
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				in economic activitie environmentally sus the EU Taxonomy				econom	environmental objective in ic activities that qualify as mentally sustainable under the EU my
				in economic activitie qualify as environme under the EU Taxon	entally sustainable			activities	environmental objective in economic that do not qualify as nentally sustainable under the EU ny
investments with an environmental objective								with a so	cial objective
might be aligned with the Taxonomy or not.			☐ It made sustainable investments with a social objective:%			It promoted E/S characteristics, but <b>did not make any sustainable investments</b>			
				ent were the en duct met?	vironmental a	ind/or	social	charac	teristics promoted by this

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained. The environmental and/or social characteristics promoted by the Fund were met by targeting and investing in companies with positive overall ESG quality.

To assist in selecting companies with positive overall ESG quality, the Investment Manager performed an ESG review of the market to identify and exclude companies with the poorest ESG credentials from the Fund's investable market. This resulted in a reduction of the investable market by at least 20%. The ESG review was applied to at least 90% of the Fund's investee companies.

In addition, throughout the period, the Investment Manager also applied an exclusion policy to exclude investment in: (i) companies with negative social characteristics including companies (a) manufacturing anti-personnel mines, cluster bombs, biological/chemical weapons, depleted uranium, nuclear weapons, white phosphorus, non-detectable fragments and blinding lasers (>0% of revenue), (b) producing and/or distributing conventional weapons (>10% of revenue), (c) directly manufacturing and/or distributing tobacco (>5% of revenue), and (d) with severe violations of the UN Global Compact without prospect for improvement; and (ii) companies with negative environmental characteristics including operators of thermal coal mines (>0% of revenue) and electricity producers with an energy mix exposed to coal exceeding defined relative or absolute thresholds (production or revenue based on coal equal to or exceeding 5 GW), without a coal exit strategy.

In respect of sustainable investment held by the Fund, please find below the list of environmental objectives (set out in Article 9 of Regulation (EU) 202/852) and the list of social objectives to which the Fund's sustainable investments contributed:

#### 1. Environmental objectives:

The Fund invested in sustainable investments with environmental objectives that contributed to the below objective:

(i) climate change mitigation.

# 2. Social objectives:

The Fund invested in sustainable investments with social objectives that contributed to the below objective:

(i) the promotion of adequate living standards and wellbeing for end users.

# How did the sustainability indicators perform?

As at end December 2023, the Fund had attained the environmental and social characteristics promoted, including:

- (i) at least 90% of the Fund's investee companies had an ESG score in the top 80% of companies rated by the Investment Manager;
- (ii) none of the Fund's investee companies were engaged in excluded activities; and
- (iii) 34.87% of assets qualified, in the opinion of the Investment Manager, as sustainable investments.

# ...and compared to previous periods?

Sustainability indicators	Data as at end of December 2023	Data as at end of December 2022
Percentage of investee companies that had an ESG score in the top 80% of companies rated by the Investment Manager.	At least 90% of the Fund's investee companies had an ESG score in the top 80% of companies rated by the Investment Manager.	At least 90% of the Fund's investee companies had an ESG score in the top 80% of companies rated by the Investment Manager.
Percentage of investee companies that were engaged in excluded activities	None	None
Percentage of assets qualified, in the opinion of the Investment Manager, as sustainable investments.	34.87%	28.11%

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

The Fund invested 34.87% of its assets in sustainable investments which contributed to the environmental objectives and social objectives listed above.

# Description of how the sustainable investments contributed to the sustainable investment objective

The sustainable investments' contribution to the environmental and/or social objectives listed above is measured by the Investment Manager using proprietary analysis.

#### For the social objectives:

- at least 25% of the investee company's revenue was generated from business activities which contributed to one or more of the United Nations' Sustainable Development Goals (SDGs number 2, 3, 4, 6, 7, 8, 9, 11, 12 and 16)<sup>1</sup>.

#### For the environmental objectives:

- **at least 25%** of the investee company's revenue was generated from economic activities that are Taxonomy eligible; or
- **at least 5%** of the investee company's revenue was generated from economic activities that are potentially<sup>2</sup> aligned to the Taxonomy.

# How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for

An assessment was performed to ensure that investments identified as contributing to one or more of the above environmental and/or social objectives did not significantly harm any of those objectives. This was done by assessing and monitoring the 14 mandatory principal adverse impact indicators and where possible relevant optional indicators referenced in Annex 1 of the SFDR Delegated Regulation (EU 2022/1288) and by seeking to ensure that such investments

<sup>&</sup>lt;sup>1</sup> SDG 2 - Zero Hunger, SDG 3 - Good Health and Well-being, SDG 4 - Quality Education, SDG 6 - Clean Water and Sanitation, SDG 7 - Affordable and Clean Energy, SDG 8 - Decent Work and Economic Growth, SDG 9 - Industry, Innovation and Infrastructure, SDG 11 - Sustainable Cities and Communities, SDG 12 - Responsible Consumption and Production and SDG 16 - Peace Justice and Strong Institutions.

<sup>&</sup>lt;sup>2</sup> This assessment is based on estimation and is not relying on company reported data.

human rights, anti- corruption and anti- bribery matters.	were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
	How were the indicators for adverse impacts on sustainability factors taken into account?
	The 14 mandatory principal adverse impact indicators have been reviewed by the Investment Manager as part of its ESG assessment for sustainable investments. The Investment Manager used external data where available and also relied on a qualitative assessment using information directly from the company or its own research where quantitative data was not available.
	For investee companies that it considered were in material sectors the Investment Manager also assessed additional relevant optional indicators to ensure the sustainable investments were not significantly harming any environmental or social objectives
	Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:
	To ascertain if companies were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights ('Guidelines and Principles'), the Investment Manager reviewed and assessed the results obtained from PAIs 10 (Violations of the Guidelines and Principles) and 11 (Lack of processes and compliance mechanisms to monitor compliance with Guidelines and Principles) to ensure that the Fund's sustainable investments were not in violation of the UN Guiding Principles during the reference period and to ensure they have put in place processes and compliance mechanisms to help meet the Guidelines and Principles. Where data was missing the investment teams performed their own qualitative assessment by reviewing additional information which may include the investee companies' policies and procedures, controversies flagged by third party providers, investee companies' membership of the UN Global Compact or NGO reports.
	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 Union 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 Union criteria for environmentally sustainable economic activities.
	Any other sustainable investments must also not significantly harm any environmental or social objectives.
	How did this financial product consider principal adverse impacts on sustainability factors?
	The Fund considered principal adverse impacts ("PAI") on sustainability factors by assessing and monitoring the 14 mandatory principal adverse impact indicators (PAIs) referenced in Annex 1 of the delegated regulation (EU) 2022/1288. The Investment Manager used external data where available and relied on information directly from the company or its own research and knowledge of the relevant industry or sector to assess the 14 mandatory principal adverse impacts.
	The Investment Manager has reviewed and considered the 14 mandatory PAI indicators. The Investment Manager has actively engaged with investee companies for better disclosure on climate and to establish a reliable roadmap for net zero targets. For GHG emissions, top emitters

in the Fund are companies in high emitting sectors and therefore high GHG emission is inherent to their business. The Investment Manager will continue to monitor their progress.

For biodiversity & water, the data coverage and company disclosure remain low. The Investment Manager is in the process of deploying a methodology to better assess investee companies' impact on biodiversity, this will help the Investment Manager in better defining mitigation actions that need to be implemented. For PAI 9, the Investment manager has engaged with some of the top contributors either directly or through collaborative initiatives.

None of the investee companies are in violation of the UNGC principles and the OECD guidelines and have all implemented processes and compliance mechanisms in line with UNGC principles and OECD guidelines.

Based on current disclosure, the Investment Manager will focus engagement activities with investee companies on the topics of unadjusted gender pay gap and board gender diversity in the following years.



## What were the top investments of this financial product?

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is:

Largest investments	Sector	% of assets	Country
ASML Holding NV	Information Technology	8.04	Netherlands
Capgemini SE	Information Technology	6.55	France
ICON Plc	Health Care	5.09	Ireland
Adyen NV	Information Technology	4.73	Netherlands
Edenred SA	Information Technology	4.37	France
Sika AG	Materials	4.31	Switzerland
AstraZeneca PLC	Health Care	4.09	United Kingdom
Lonza Group AG	Health Care	3.73	Switzerland
Bakkafrost P/F	Consumer Staples	3.57	Norway
Sartorius Stedim	Health Care	3.44	France
Biotech S.A.			
DSV A/S	Industrials	3.43	Denmark

The top investments represent the greatest proportion of investments over the course of the period covered, calculated at appropriate intervals to be representative of that period.



#### What was the proportion of sustainability-related investments?

The proportion of sustainable investment was 34.87% and included 10.63% of sustainable investments with a social objective and 24.24% of sustainable investment with an environmental objective. Please see below the breakdown:

Breakdown of the proportion of the sustainable investme environmental objectives set out in Article 9 of Regulation (EU) those investments contributed	•
Environmental objective	% of assets
Climate change mitigation	24.24%

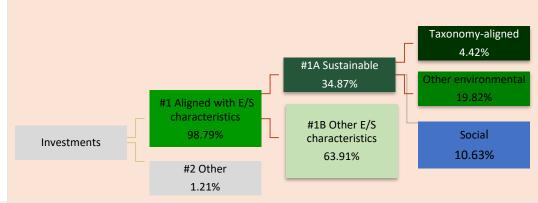
Breakdown of the proportion of the sustainable investments per each of social objectives to which those investments contributed			
Social objective	% of assets		
Promotion of adequate living standards and wellbeing for end	10.63%		
users			

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

#### What was the asset allocation?

As at end of December 2023, 98.79% of the assets of the financial product were used to meet the environmental and social characteristics promoted. This included 34.87% of sustainable investments. 1.21% of assets were not aligned with the environmental or social characteristics.

The Fund was primarily invested in direct holdings of listed equities. 98.79% of the investments in listed equities were aligned with the environmental and/or social characteristics.



**#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.

**#20ther** 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 environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

#### In which economic sectors were the investments made?

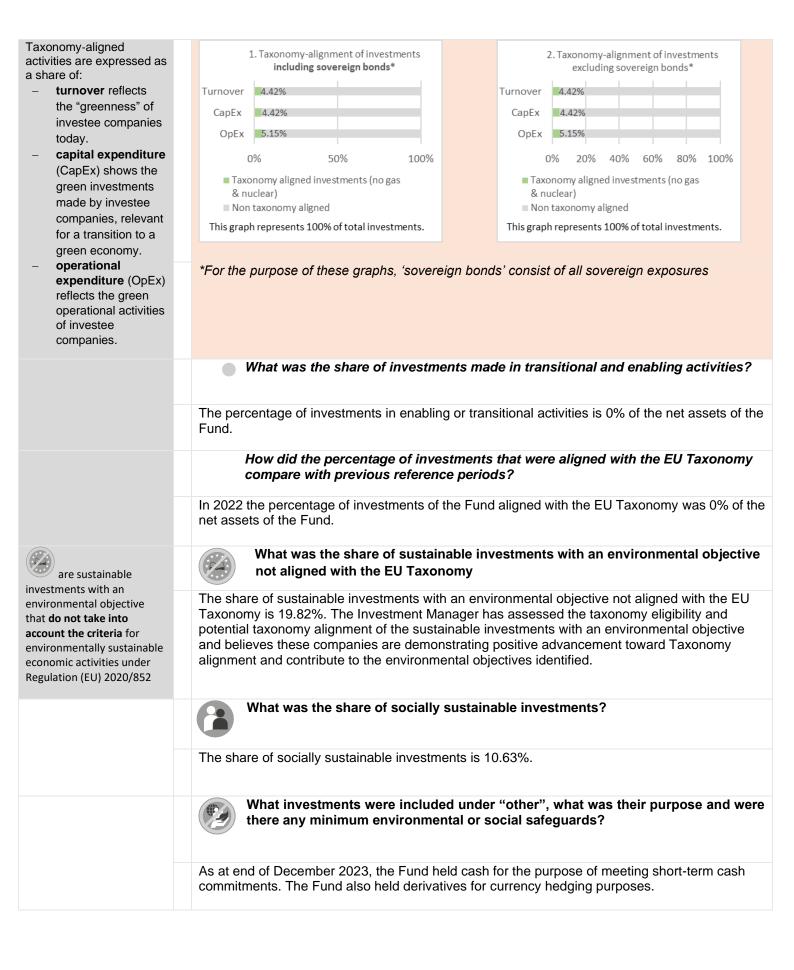
#### Sector breakdown

Sector	% of assets
Health Care	26.14
Information Technology	22.89
Industrials	14.21
Financials	12.45
Consumer Discretionary	7.58
Consumer Staples	6.40
Materials	4.77
Communication Services	4.33
Cash	1.35

Data as of end of December. Due to rounding difference, figures may not add up to 100%

#### Sub-industry breakdown **Sub-industry** % of assets Life Sciences Tools & Services 13.34 Semiconductor Materials & Equipment 11.56 IT Consulting & Other Services 9.66 Transaction & Payment Processing Services 9.24 Apparel Accessories & Luxury Goods 6.50 Pharmaceuticals 5.90 Specialty Chemicals 4.77 Packaged Foods & Meats 3.34 Health Care Equipment 3.33 Financial Exchanges & Data 3.21 **Building Products** 3.19 Interactive Media & Services 3.11 Distillers & Vintners 3.06 Passenger Airlines 3.03 Heavy Electrical Equipment 2.66 Health Care Supplies 2.49 Air Freight & Logistics 2.39 Industrial Machinery & Supplies & Components 2.06 **Application Software** 1.67 Cash 1.35 Movies & Entertainment 1.22 Apparel Retail 1.08 Biotechnology 1.07 **Electrical Components & Equipment** 0.89 Data as of end of December. Due to rounding difference, figures may not add up to 100% To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy? The percentage of sustainable investments with an environmental objective of the Fund aligned with the EU Taxonomy is 4.42% of the net assets of the Fund. **Enabling activities** directly enable other Did the financial product invest in fossil gas and/or nuclear energy related activities to make a activities that comply with the EU Taxonomy<sup>3</sup>? substantial contribution to Yes an environmental objective. ☐ In fossil gas ☐ In nuclear energy Transitional activities X No are activities for which low-carbon alternatives are not yet available and The graphs below show in green the percentage of investments that were aligned with the among others have EU Taxonomy. As there is no appropriate methodology to determine the taxonomygreenhouse gas emission alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation levels corresponding to to all the investments of the financial product including sovereign bonds, while the second the best performance. graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

<sup>&</sup>lt;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 objectives. 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.





What actions have been taken to meet the environmental and/or social characteristics during the reference period?

Several actions were taken to meet the environmental and/or social characteristics during the reference period.

#### Engagement activities:

Maintaining an active relationship with investee companies is a key element of the Investment Manager's investment process.

In 2023, 23 engagement activities were carried out with 12 companies in the Fund to encourage best practices with regard to ESG topics, including working toward mitigating any adverse impacts identified. 30.4% of the engagement activities were related to Environmental topics, 8.7% to Social topics, 17.4% to Governance topics and 43.5% to combined ESG topics.

# Voting activities:

The Investment Manager exercises its right to vote at shareholder meetings in accordance with corporate governance values and voting principles that have been determined by the Investment Manager with reference to regulations, industry standards and best practice. The Investment Manager's objective is to vote systematically at all shareholder meetings when it is technically possible to do so.

In 2023, the Investment Manager exercised its voting rights at 97.4% of shareholders' meeting for companies held by the Fund.

BREAKDOWN OF VOTES	%
For	87.8%
Against	11.1%
Abstentions or Withholdings	1.1 %
In Line with Management	89.2%
Against Management	10.8%