Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: CT (Lux) Sustainable Multi-Asset Legal entity identifier: 213800VPOORXSZ9R2T24

Income

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.

Sustainable investment objective

000	s this fi	nanciai product nave a sustainable i Yes	• • •	No No
*	invest	make a minimum of sustainable ments with an environmental ive: 1% 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	chara its ob have	incteristics and while it does not have as bjective a sustainable investment, it will a minimum proportion of% of inable 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
*		make a minimum of sustainable ments with a social objective: 1%		motes E/S characteristics, but will nake any sustainable investments



What is the sustainable investment objective of this financial product?

The investment objective of the Portfolio is to achieve capital appreciation and income through sustainable investments, while maintaining long-term value.

The Investment Manager seeks to avoid investments that are contrary to the goals of making positive contributions to society and/or the environment; invest in companies that provide sustainable solutions or that make positive contributions to society and/or the environment; and improve companies by selecting those that, in the Investment Manager's opinion, will benefit from investor engagement.

The Portfolio aims for a minimum of 90% of investments to be classified as sustainable investments.

The remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.

The Portfolio's minimum allocation to sustainable investments with either an environmental or social objective is 1%, respectively. However, the actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those

sustainable investments available offering the most potential upside from a sustainability and financial returns perspective.

The Investment Manager does not use a reference benchmark in respect of the sustainable investment objective applied to the Portfolio.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The Investment Manager uses the following indicators to measure the attainment of the sustainable investment objective of the Portfolio:

- The number of companies determined to be in breach of the Portfolio's exclusion criteria and/or global norms.
- Held companies' revenue alignment with the targets which underpin the UN Sustainable Development Goals (SDGs)
- The percentage of the Portfolio which constitutes labelled bonds, including Sustainability-Linked Bonds and Green Bonds
- The number of environmental- and social-linked engagement objectives the Portfolio achieves

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The Portfolio's investment philosophy, as explained in more detail in the "investment strategy" below ensures that the sustainable investments made by the Portfolio do not significantly harm sustainable investment objectives.

The Portfolio screens out investments that are contrary to the goals of making positive contributions to the environment and/or society. These exclusions are detailed under the "avoid" section of the investment process and additional information is available in the Article 10 SFDR disclosures at www.columbiathreadneedle.com by selecting the Portfolio and accessing the Literature section. These criteria are product- and conduct-based, covering topics such as tobacco and weapons, and United Nations Global Compact breaches.

Through the Investment Manager's investment research, Sustainability Risks are considered at all points in the investment cycle, which serves to mitigate the risks of significant harm on a continuous basis. Furthermore, companies are identified which the Investment Manager thinks could benefit from active engagement to address material ESG issues.

The Investment Manager monitors portfolio holdings every quarter, and any position held by the Portfolio that no longer qualifies must be sold within six months taking due consideration of the best interests of the shareholders.

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

Investments which are reported as sustainable investments have been assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an inhouse data driven model and investment team due diligence.

The model identifies harm by using a quantitative threshold against a selection of principal adverse impact indicators. Issuers which fall below these thresholds are flagged as potentially harmful. This is then considered taking account of the

materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available investment teams endeavour to satisfy that no significant harm has taken place through desk-based research or issuer engagement.

In addition, all holdings must comply with a set of environmental and social exclusions which seek to avoid harming Sustainability Factors as detailed below.

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

The sustainable investments are aligned with 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.

The Portfolio excludes companies which breach UN Global Compact (UNGC) principles and further considers good conduct when making investments. In addition, the DNSH checks also assess issuers for explicit harm against the underlying principles of the UNGC and OECD Guidelines.

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



Yes

The Portfolio proactively considers the principal adverse impact ("PAIs") of investment decisions that may negatively harm Sustainability Factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As part of portfolio construction and stock selection, the Portfolio has in place exclusions that correspond to PAI indicators that cannot be held by the Portfolio. A selection of exclusions applied by the Portfolio relate to PAIs such as fossil fuel exposure, non-renewable energy production, global norms, and controversial weapons. In addition, it considers PAIs as part of research into, and engagement with, investee companies on environmental PAI indicators relating to decarbonisation and biodiversity, and social PAI indicators such as board gender diversity and discrimination.

More information on how the Portfolio considers the PAIs of its investment decisions on Sustainability Factors will be made available in the Fund's annual reports available at the registered office of the Fund.

	Exclusions	Stewardship ¹⁶			
Indicators Applicable to Investments in Corporate Issuers					
1.1. GHG emissions		✓			
1.2. Carbon footprint		√			
1.3. GHG intensity of investee companies		✓			
1.4. Exposure to companies active in the fossil fuel sector	√	√			

PAIs are considered as part of engagement prioritisation. Where certain harmful practices are identified, and engagement is unsuccessful, this may, over time and in certain instances, lead to divestment.



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, anticorruption and antibribery matters.

1.5. Share of non-renewable energy consumption and production	✓	√				
1.6. Energy consumption intensity per high impact climate sector		√				
1.7. Activities negatively affecting biodiversity sensitive areas		√				
1.8. Emissions to water		✓				
1.9. Hazardous waste and radioactive waste ratio		√				
1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	✓	√				
1.11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises		√				
1.12. Unadjusted gender pay gap		✓				
1.13. Board gender diversity		√				
1.14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	✓					
2.15. Deforestation		✓				
3.7. Incidents of discrimination		✓				
Indicators Applicable to Investments in Sovereigns and Supranationals						
1.15. GHG Intensity						
3.19. Average freedom of expression score	√					
3.21. Average corruption score	✓					
3.24. Average rule of law score						



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

What investment strategy does this financial product follow?

The investment strategy embeds an "Avoid, Invest, Improve" philosophy:

Avoid – The Investment Manager has a set of exclusion criteria setting threshold standards to avoid investment in issuers with socially or environmentally damaging products or unsustainable business or governance practices.

Invest – The Investment Manager invests in issuers providing sustainability solutions and/or companies making a positive contribution to society and/or the environment. These include issuers that are aligning to SDGs and Sustainability-Linked Bonds and Green Bonds.

Improve – While all investments of the Portfolio will be sustainable, the Investment Manager considers that all investments can nevertheless be improved. The Investment Manager engages with companies on material ESG issues with most business relevance to reduce risk, and believes that this active ownership is part of our duty as an investor acting in the best interests of our clients, and as a participant in the global financial system.

In addition, as part of active ownership, the Investment Manager has the responsibility to take key ESG issues into account before, during and after investment decisions made for the Portfolio. The purpose of engagement is to mitigate risk, to underpin long-term returns, and to contribute to a more sustainable world by encouraging better management of sustainability issues by our investee companies. The global engagement programme of the Investment Manager is structured around the following core themes:

- Environmental Stewardship
- Climate Change
- Human Rights
- Labour Standards
- Public Health
- Business Ethics
- Corporate Governance

As noted above, the Investment Manager adheres to international standards such as 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.

In addition to assurance around good corporate governance, the Investment Manager may seek to engage companies to encourage them to adopt best-in-class practices in their management of a range of ESG risks.

Alternatives, such as sustainable infrastructure and property, must also adhere to the Portfolio's exclusion and sustainable investment commitments.

The Investment Manager will apply the non-financial criteria described above to at least 90% of the total net assets of the Portfolio.

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The following elements of the investment strategy are binding on the Portfolio:

- (1) The Portfolio complies with exclusion criteria, which are both product- and conduct-based, to avoid companies with environmentally or socially damaging products, or unsustainable business or governance practices.
- (2) The Portfolio avoids investment in companies which are determined to be in breach of global norms, including the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- (3) The Portfolio seeks investments providing sustainability solutions and/or investments making a positive contribution to society and/or the environment, which can be assessed through mapping revenue segments, use of proceeds or through their enterprise impact that contributes to the Sustainable Development Goals' (SDG) underlying targets.

The Portfolio complies with the Paris-aligned Benchmark exclusions contained in Article 12 (1) (a)-(g) of Article 12(1)(a)-(g) of Commission Delegated Regulation (EU) 2020/1818). The restrictions referred to in point (1) and (2) above are applied regardless of the severity of any controversies which an investee company is/has been involved in. For further information, please refer to the Investment Policies available on www.columbiathreadneedle.lu by selecting the Portfolio and accessing the Literature section.

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

All companies in which investments are made are subject to a pre-investment good governance assessment and ongoing post-investment review of governance practices. The Investment Manager uses third-party data to assess a company's governance practices and supplements this with its fundamental research.

Pre-investment: The Investment Manager assesses all companies before investment. It may engage with a company to better understand or to encourage improvements relating to any flagged issues. If, however, it is concluded from the assessment that the company demonstrates poor governance practices, the Investment Manager will not invest in its securities.

Post-investment: Investee companies are monitored on an ongoing basis to confirm that there has been no material diminution in governance practices. The Investment Manager may engage with a company to better understand any flagged issues as part of its review. Where it is considered that a company no longer demonstrates good governance practices, the securities will be divested from the Portfolio.

The Investment Manager employs stringent criteria to determine the eligibility of investee companies' good governance practices. It uses proprietary ESG scores to assess performance on corporate governance, corporate behaviour, and human capital development. Companies scoring in the lowest segment of ESG scores will not be invested in, unless mitigating factors exist. The Investment Manager also monitors holdings using governance risk flags, which identify governance failures or risks which should be addressed by further research, voting or engagement where relevant.

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.

What is the asset allocation and the minimum share of sustainable investments?

The Portfolio invests in a range of global asset classes, gaining exposure directly or indirectly to equities, fixed income, and alternatives in accordance with its respective investment objective and policy. The proportion of direct investment varies given the actively managed nature of the Portfolio but generally a large majority of the Portfolio will be directly invested in these asset classes.

At least 90% of the assets held by the Portfolio are "sustainable investments" for the purposes of SFDR. These assets are subject to investment policy of the Portfolio and the binding elements of the investment strategy to meet the sustainable investment objective. The remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.

An investment is considered sustainable where the issuer has greater than 50% of its revenue net positively aligned to the Sustainable Development Goals (SDG), or an issuer contributing to a sustainable objective by embedding sustainability into the economic purpose of its business (e.g. growing the proportion of revenue aligned with sustainability objectives, or delivering its enterprise impact in a way which contributes to a sustainable outcome).

In addition, a sustainable investment may be a use-of-proceeds bond which meets specific criteria. The Investment Manager requires an issuer of use-of-proceeds bonds to intentionally allocate the proceeds to achieve a measurable environmental and/or social impact.

Investments which do not meet the criteria for sustainable investments are not included in the Portfolio's proportion of sustainable investments. To calculate the Portfolio's overall proportion of sustainable investments, each investment that meets the above criteria is included in the calculation of sustainable investments (without adjusting for example for the percentage of revenue that contributes to SDGs) held in the Portfolio. It being noted, however, that the percentage of revenue that is not linked to a contribution to SDGs will also need to meet the "do no significant harm test" in order to for the entire investment to be considered a sustainable investment. The entire position of these investments is included in the calculation and added together to determine the total proportion of sustainable investments within the Portfolio.

All investments, with the exception of ancillary assets described below, in which the Portfolio invests are subject to the binding elements of the investment strategy to meet the sustainable investment objective and are classified as sustainable investments. No minimum allocation to sustainable investments with either an environmental or social objective has been set.

#1 Sustainable covers sustainable investments with environmental or social objectives. #2 Not sustainable Environmental includes #1Sustainable investments which Investments Social do not qualify as #2 Not sustainable sustainable investments.

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 sustainable investment objective?

Derivatives are permitted within the Portfolio in order to assist with efficient management of overall asset class positions such as mitigating interest rate fluctuations, hedging against price falls in equity markets, or managing currency exposure. Derivatives are not used for the purposes of attaining the sustainable investment objective of the Portfolio but ESG criteria are applied with respect to the counterparties with which the Portfolio will transact.



To comply with the EU

Taxonomy, the criteria for **fossil gas** include

renewable power or low-carbon fuels by the

end of 2035. For nuclear energy, the criteria include comprehensive safety

management rules.

Enabling activities

contribution to an

Transitional activities

are activities for which

low-carbon alternatives

are not yet available ad

levels corresponding to

the best performance.

among others have greenhouse gas emission

environmental objective.

directly enable other activities to make a

and waste

substantial

limitations on emissions and switching to fully

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

None. The Portfolio aims to invest a minimum of 90% of its assets in sustainable investment.

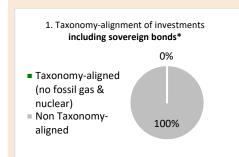
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹⁷?

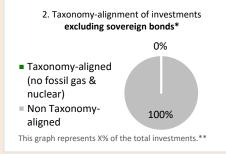
Yes:

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

** As the investments are not Taxonomy-aligned, the exclusion of sovereign bonds has no impact on the graph and therefore no such percentage is shown here.

What is the minimum share of investments in transitional and enabling activities?
None.

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.

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 Portfolio's minimum allocation to sustainable investments with an environmental objective is 1%. The actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those sustainable investments available offering the most potential upside from a sustainability and financial returns perspective. The Portfolio aims to invest a minimum of 90% of its assets in sustainable investments and the remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.



What is the minimum share of sustainable investments with a social objective?

The Portfolio's minimum allocation to sustainable investments with a social objective is 1%. The actual allocations between environmental and social objectives will depend on the investment opportunities considered by the Investment Manager. This is to ensure that the Portfolio can allocate capital to those sustainable investments available offering the most potential upside from a sustainability and financial returns perspective. The Portfolio aims to invest a minimum of 90% of its assets in sustainable investments and the remaining portion of the Portfolio consist of ancillary assets used for treasury management, defensive or hedging purposes that the Portfolio may hold as described below.



What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

This category includes ancillary liquid assets, money market instruments, money market funds and eligible deposits as well as hedging assets used for treasury management, defensive or hedging purposes. Derivatives are permitted within the Portfolio in order to assist with efficient management of overall asset class positions such as mitigating interest rate fluctuations, hedging against price falls in equity markets, or managing currency exposure. Derivatives are not used for the purposes of attaining the sustainable investment objective of the Portfolio but ESG criteria are considered when assessing counterparties.

The counterparty approval process of the Investment Managers include input from the credit analysts, who produce explicit ESG scores for all the entities they research. The responsible investment team additionally engages with trading counterparties and clearing members on ESG topics to assess their ESG credentials and to foster improvement in areas of concern. This engagement work is structured both in terms of prioritisation with respect to companies to which the Investment Managers have the greatest exposure and to companies which the Investment Managers feel have the greatest ESG deficiencies, and in terms of progress monitoring against pre-defined milestones.

Currency exposures may arise from securities held within the portfolio if not hedged. Additional currency exposures can be added but must be consistent with the sovereign bond ESG criteria, with the exception of the reserve currencies (Euro, US Dollar, GB Pound, Japanese Yen). This exception will be capped at 30% of the portfolio under normal market conditions, however, may be temporarily exceeded under extraordinary market conditions. Currency exposures may be taken via currency derivatives (forwards, futures and options) or cash or public debt instruments.



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

The Investment Manager does not use a reference benchmark in respect of the sustainable investment objective applied to the Portfolio.

Reference benchmarks are indexes to measure

are indexes to measure whether the financial product attains the sustainable investment objective.

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

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:

<u>Columbia Threadneedle Investments - Funds and Prices - CT (Lux) Sustainable Multi-Asset Income I Inc EUR- SF57-LU2051395163 - Luxembourg - EN - Intermediary</u>