

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

Product name: Sycomore Opportunities **Legal entity identifier:** 969500N1MLQB10AF5716
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Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that it does not cause significant harm to any of these objectives and that the companies in which the financial product invests apply 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.

Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ____% <div style="margin-left: 40px;"> <input type="checkbox"/> in economic activities that are considered environmentally sustainable under the EU taxonomy <input type="checkbox"/> in economic activities that are not considered environmentally sustainable under the EU taxonomy </div> <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ____%	<input checked="" type="checkbox"/> It promotes environmental and social characteristics (E/S) and, although it does not aim for sustainable investment, it will contain a minimum of 1% of sustainable investments <div style="margin-left: 40px;"> <input type="checkbox"/> having an environmental objective in economic activities that are considered environmentally sustainable under the EU taxonomy <input checked="" type="checkbox"/> having an environmental objective in economic activities that are not considered environmentally sustainable under the EU taxonomy <input checked="" type="checkbox"/> with a social goal </div> <input type="checkbox"/> It promotes E/S characteristics, but will not make sustainable investments

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

As the Fund is a Feeder Fund investing at least 95% of its net assets in units of the Sycomore Partners Master Fund, the Feeder Fund promotes the same environmental and/or social criteria as the Master Fund, adjusted by 5% due to the cash that may be held by the Feeder Fund.

The Master Fund aims to achieve performance above that of the composite index formed of 50% STOXX Europe 600 Net Total Return + 50% capitalised €STR, over a minimum recommended investment horizon of five years through a careful selection of European and International equities with binding ESG criteria and an opportunistic and discretionary variation in the portfolio's exposure to equity markets.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



The investment policy is based on a participatory approach that takes advantage of Sycomore AM's expertise in allocation, stock selection and portfolio construction. Regarding stock selection, the management team draws on the highest convictions of our key strategies, including multi-thematic management in European equities (large-, small-, and mid-cap), as well as thematic management focused on the environment, social dimensions, and technology.

No benchmark has been appointed to determine whether the Master Fund or the Feeder Fund complies with the environmental and/or social criteria they promote.

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

The sustainability indicators used to measure the achievement of each of the environmental or social criteria promoted by the Feeder Fund in relation to its investment in its Master Fund must be assessed at the level of the Master Fund.

The Master Fund will assess the attainment of each of the environmental or social criteria using the following sustainability indicators, among others:

At the level of the investee companies:

- **SPICE ratings of investee companies:** SPICE¹ stands for Society & Suppliers, People, Investors, Customers and Environment. This tool assesses the sustainability of corporate performance. It integrates the analysis of economic, governance, environmental, social, and societal risks and opportunities into the commercial practices and product and service offerings of companies. The analysis takes into account a selection of criteria from which a score between 1 and 5 per SPICE letter is obtained. These 5 ratings are weighted such that environmental issues make up 20% (SPICE rating E), social issues make up 40% (SPICE Ratings S, P, & C) and governance issues make up 20% (50% SPICE Rating I).
- **At the societal level: Societal contribution of products and services.** The assessment of the societal contribution² combines the positive and negative societal contributions of products and services of a company. The methodology is based on the societal aspects of the 17 UN Sustainable Development Goals (SDGs) and their 169 targets.
- **At the level of human capital:** two indicators relate to SDG 8 ('Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.') and SDGs 3, 4, 5, and 10 for the former:
 - **The Happy@Work rating³:** the framework provides a comprehensive and objective assessment of the level of well-being at work.
 - **The Good Jobs rating⁴:** a metric that aims to assess, on a scale of 0 to 100, a company's overall ability to create sustainable and quality jobs for all, particularly in areas - countries or regions - where employment is relatively limited and therefore necessary for sustainable and inclusive development.

¹ Further information is available on the website, which can be found at the end of this document

² Ibid

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⁴ Ibid

- **At the environmental level: the Net Environmental Contribution⁵ (NEC) indicator.** The NEC enables investors to measure to what extent a given business model contributes to the ecological transition. The score is calculated on a scale from -100%, for the activities that are the most damaging to the environment, to +100% for activities providing a strong positive environmental impact. The NEC targets five impact categories (challenges: climate, waste, biodiversity, water, air quality) by business group (areas of contribution: ecosystems, energy, mobility, construction, production). **Compliance of investee companies with the Investment Manager's SRI exclusion policy.**
- **Compliance of investee companies with the Investment Manager's controversy review process.**
- **Compliance of investee companies with the Investment Manager's PAI policy.**

● ***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?***

The Master Fund may partially make sustainable investments with a social or environmental objective. Investments are classified as sustainable if they are identified as contributing positively to environmental or social challenges through their products or services or through their practices.

The qualification of a sustainable investment requires 1/the achievement of a minimum score on at least one of the indicators of positive contribution of the definition of sustainable investment established by Sycomore AM, 2/the absence of significant harm, 3/good governance practices. These elements are detailed in Sycomore Asset Management's ESG Integration Policy⁶.

It should be noted that, in terms of the Master Fund's investments in companies, it undertakes to invest a minimum of 25% of its net assets in underlying assets qualifying as sustainable investments under the terms and conditions set forth herein, whether the objective of its investments be environmental or social in nature.

⁵ Ibid

⁶ Sycomore AM ESG Integration Policy

To what extent do the sustainable investments that the financial product intends to pursue in particular not cause significant damage to an environmentally or socially sustainable investment objective?

Four elements are put in place to prevent sustainable environmental or social objectives from being significantly affected, on an ex ante basis, before any investment decision at the level of the Master Fund.

Indeed, investments targeted by one or more of the following criteria will not be considered as sustainable investments at the level of the Master Fund:

1. **As indicated in the management company's SRI policy:** activities are limited for their controversial social or environmental impacts, as defined and reviewed each year in Sycomore AM's basic policy (applicable to all direct investments of Sycomore AM) and in the Socially Responsible Investment (SRI) policy (applicable to all UCITS, mandates and dedicated funds managed according to an SRI strategy).
2. **Companies concerned by a level 3/3 controversy:** identified based on the Investment Manager's in-depth analysis of controversies. Companies classified as most controversial (-3 on the Sycomore AM scale, from 0 to -3) are considered to be in breach of one of the principles of the United Nations Global Compact.
3. **SPICE rating below 3/5:** The SPICE methodology covers all environmental, social, and governance issues targeted by the indicators of adverse impacts on sustainability factors listed in the Regulatory Technical Standards. A lower rating, less than 3/5, indicates a lower sustainability performance on one or more adverse impacts.
4. **According to Sycomore AM's Principal Adverse Impacts policy⁷:** a PAI policy to identify additional risks of significant impacts on the environmental and social issues covered by the PAI indicators listed in Table 1 of Annex I of the SFDR Regulation is implemented. Companies meeting all the exclusion criteria relating to GHG emissions, biodiversity, water, waste, gender equality, the principles of the United Nations Global Compact/OECD Guidelines for Multinational Enterprises, or controversial weapons, will be declared 'unsustainable'.

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

At the level of the Master Fund, the adverse impact on sustainability factors involves indicators at two levels:

1. **Solely for sustainable investments:** a PAI policy based directly on the indicators in Table 1 of Annex I and all relevant indicators in Tables 2 and 3.
2. **For all investments in the financial product:** The framework of the SPICE analysis considers all the issues covered by all the indicators of adverse impacts on sustainability factors, with the ability to use them to feed into the analysis.

PAI policy: each sustainability factor referred to in Table 1 of Annex I was associated with an exclusion criterion as outlined in the Sycomore AM PAI policy.

⁷ Further information is available on the website, which can be found at the end of this document

SPICE rating:

The SPICE methodology covers all environmental, social, and governance issues targeted by the indicators of adverse impacts on sustainability factors listed in the Regulatory Technical Standards.

More specifically, Sycomore AM's SPICE fundamental analysis model is an integrated model that provides a holistic view of companies in the investment universe. It has been developed taking into account the OECD Guidelines for Multinational Enterprises. It fully integrates ESG factors to understand how companies manage adverse impacts as well as key sustainable opportunities using a dual materiality approach. Sycomore AM's PAI policy sets out how the issues covered by the PAI are covered by SPICE.

Exclusion policy: Finally, Sycomore AM's exclusion policy targets indicators of adverse impact on sustainability, including controversial weapons, exposure to the fossil fuel sector, production of chemical pesticides, and more generally, has been drafted to target companies that violate the principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Once the analysis (SPICE analysis including the examination of controversies, compliance with the exclusion policy, compliance with the PAI policy) has been carried out, it affects investment decisions as follows:

- As mentioned in the previous question, it offers protection against material damage to any sustainable investment objective, excluding companies that do not meet minimum safeguard requirements;
- It also has an impact on investment decisions in two ways: 1. assumptions related to the company's outlook (growth and profitability forecasts, liabilities, mergers and acquisitions, etc.) can be reinforced by certain results of the SPICE analysis where applicable, and 2. certain fundamental assumptions of the valuation models are systematically linked to the results of the SPICE analysis.

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

The development of Sycomore AM's 'SPICE' analytical framework and exclusion policy are based on the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, International Labour Organization standards and the United Nations Guiding Principles on Business and Human Rights. To assess the fundamental value of a company, at the Master Fund level, analysts systematically examine how a company interacts with its stakeholders. This fundamental analysis aims to understand the strategic issues, business models, quality of governance and degree of integration of sustainability considerations, as well as the risks and opportunities facing the company. Sycomore AM has also defined its human rights policy in accordance with the United Nations Guiding Principles on Business and Human Rights.

Despite the due diligence described above to identify potential violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, effective compliance with the issuers analysed can never be guaranteed.

The EU Taxonomy sets out a 'do no 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.



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



Yes, indirectly through its investments in the Master Fund, as indicated in the previous sub-section:

- o The principal adverse impacts, as well as all other adverse impacts, are taken into account at the level of the Master Fund for any investment of the portfolio through the SPICE analysis and results, supplemented by the exclusion policy of Sycomore AM.
- o In addition, to be eligible as a sustainable investment at the Master Fund level, any investment must comply with the PAI policy, including the principal adverse impacts.

Information on the principal adverse impacts on sustainability factors will be published in the annual report of the Feeder Fund and the Master Fund.



No



What investment strategy does this financial product follow?

The Feeder Fund shall permanently invest at least 95% of its net assets in units from the Master Fund: Sycomore Partners.

The Master Fund's investment strategy is based on the option given to the management team to vary, on an opportunistic and discretionary basis, the portfolio's exposure to the European and International equity markets (of which 10% maximum on emerging markets) from 0% to 100% of net assets, while complying with the requirements of French plans d'épargne en actions (PEA), i.e. the French personal equity savings plan.

At the level of the Master Fund, equities are selected based on a thorough fundamental analysis of companies, without sector or capitalisation restrictions, but according to the following geographical restrictions:

Equities of issuers with their registered office in European Union countries and/or in Switzerland and/or in the United Kingdom may represent between 75% and 100% of the Fund's net assets (financial instruments eligible for the French plans d'épargne en actions (PEA) at any time for at least 75% of the net assets of the Master Fund);

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

- Equities from issuers headquartered outside these countries (including emerging markets) can represent up to 10% of the Master Fund's net assets.

For more details on the Fund's investment strategy, please refer to the Fund's prospectus.

The Master Fund's investment strategy fully integrates ESG (environmental, social (including human rights), and governance) issues. This integration is carried out through the Management Company's proprietary 'SPICE' methodology described earlier, and as described in the ESG integration policy made available on the website.

We aim to identify the risks and opportunities to which companies are exposed by following a dual materiality approach, and more specifically:

- On the Environment, Pillar E evaluates how companies take environmental protection into account in the conduct of their business as well as in their supply of products and services. It also looks at how the environment can affect the company's activities. It fully integrates analysis of transition risk and physical risk exposure;
- At a social level, Pillars P, S and C aim to understand how companies integrate risks and opportunities related to human capital, relations with suppliers and clients and society as a whole. In particular, respect for workers' rights, employee health and safety, the quality of the working environment, the societal contribution of products and services, the ability of companies to contribute to the creation of quality jobs and respect for human rights throughout the business value chain are key issues covered by the analysis.
- On governance, Pillar I examines how companies recognise the interests of all stakeholders by sharing value equitably. This includes shareholder structure analysis, the alignment of senior management with the strategy, and the quality of the integration of sustainability issues into the strategy.

The Master Fund's investment universe is defined according to a minimal SPICE rating, but also according to specific criteria in the SPICE overall analysis and rating methodology (see the next item on the binding elements of the investment strategy).

Our SPICE methodology also contributes to analysing a company's exposure and/or contribution to the United Nations Sustainable Development Goals (SDGs). Concerning human capital, our approach for assessing human capital in the company refers explicitly to SDGs 3, 4, 5, 8, and 10 on social issues such as health, lifelong learning, gender equality, full employment, decent work, and reducing inequality. Concerning society and subcontractors, the assessment of the societal contribution is based on the analysis of positive and negative contributions from business activities under 4 pillars (access and inclusion, health and security, economic and human progress and employment) and refers explicitly to SDGs 1, 3, 5, 6, 7, 8, 9, 10, 11, 12, 16, and 17. Concerning the environment, the assessment of the net environmental contribution (NEC) analyses the positive and negative impacts of companies and their products and services on 5 issues (climate, biodiversity, water, waste/resources, and air quality) directly related to environmental SDGs 2, 6, 7, 9, 11, 12, 13, 14, and 15.

The main methodological limits are as follows:

- The availability of data for ESG analysis;
- The quality of the data used to assess the quality and impact of ESG as there are no universal standards for ESG information and third-party verification is not systematic;
- Data comparability because not all companies publish the same indicators;

- The use of proprietary methodologies that rely on the experience and expertise of the asset manager's staff.

● ***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?***

Two main filters, one of exclusion and the other of selection, are used at the Master Fund level.

- **Selection filter:** its objective is to ensure a selectivity of 20% in relation to the starting universe of the Master Fund, consisting of companies listed on international markets, domiciled mainly within the European Union, from all sectors combined, covered by our ESG data providers. The Master Fund selects companies which get a minimum SPICE rating which ensures a rate of selectivity of at least 20% from the initial universe at any time.
- **Exclusion filter:** this filter excludes companies which present sustainability risks that could call into question those companies' competitiveness or that could be the source of major negative impacts. A company is thus excluded from the Master Fund if:
 1. it is involved in activities identified in the Sycomore AM **exclusion policy** for their controversial social or environmental impacts, or
 2. if the company is concerned by a **level 3/3 controversy**.

Additionally, the Master Fund undertakes to invest a minimum of 25% of its net assets in underlying assets qualifying as sustainable investments, whether the investment objective is environmental or social.

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

As part of its investment strategy, the Master Fund's eligible investment universe is thus reduced by at least 20% compared to the initial universe (as described herein and in the Fund prospectus).

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

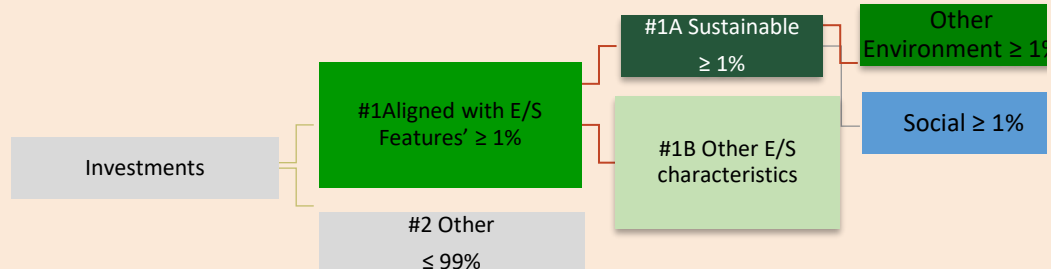
Governance is part of the SPICE analysis, including a section dedicated to governance (section 'G') in Pillar 'I,' which has a significant focus on governance bodies, and integrates other governance elements from the other pillars, including employee relations and compensation within Pillar 'P', as well as tax practices within Pillar 'S'. The overall governance of the issues associated with each type of stakeholder (Society & Suppliers, People, Investors, Clients, and Environment) is addressed in each of these pillars.

Other requirements to exclude from the investment universe insufficient governance practices in section 'G', associated with a minimum threshold, are included in Sycomore AM's exclusion policy.

Good governance practices that include sound management structures, employee relations, employee compensation and tax compliance.



What is the asset allocation planned for this financial product?



#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.

#2 Other includes the remaining investments of the financial product that are neither aligned with 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 sustainable investments with environmental objectives;
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The asset allocation describes the portion of investments in specific assets.

The binding elements described herein apply to any of the Master Fund's investments (excluding cash and derivatives used for hedging).

Through its investments in the Master Fund, the asset allocation of the Feeder Fund is as shown in the chart below:

It should be noted that the percentages mentioned in the chart above are expressed in relation to the net assets of the Feeder Fund. In the case of investments by the Master Fund in companies, the Master Fund undertakes to make at least 25% of its investments in companies that meet the sustainable investment criteria in accordance with the conditions set out in this document. Investments in companies include any financial instruments issued by a corporate body (such as equities and bonds).

Due to the Master-Feeder structure, the Feeder Fund shall permanently invest at least 95% of its net assets in units from the Master Fund. Therefore, in relation to the Master Fund, the asset allocation is allocated up to 5% by additional cash, presented in the 'Other' category.

The objective for the remaining portion of investments, including a description of minimum environmental or social guarantees, is set out in the following questions: 'What investments are included under '#2 Other', what is their purpose and are there any minimum environmental or social safeguards?'

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

The Feeder Fund does not use derivatives.

The policy for using derivatives, whose underlying assets are subject to the SPICE analysis process, is compatible with the objectives of the Master Fund and consistent with its inclusion in a long-term perspective. It is not intended to significantly or permanently distort the ESG selection policy. The use of derivatives is limited to techniques allowing for efficient management of the portfolio of securities in which the Master Fund is invested. The Master Fund may not hold a short position in any asset selected as ESG, according to its own method of ESG asset selection.



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

NA

- Does the financial product invest in fossil gas and/or nuclear power activities that comply with the EU taxonomy⁸?



Yes:

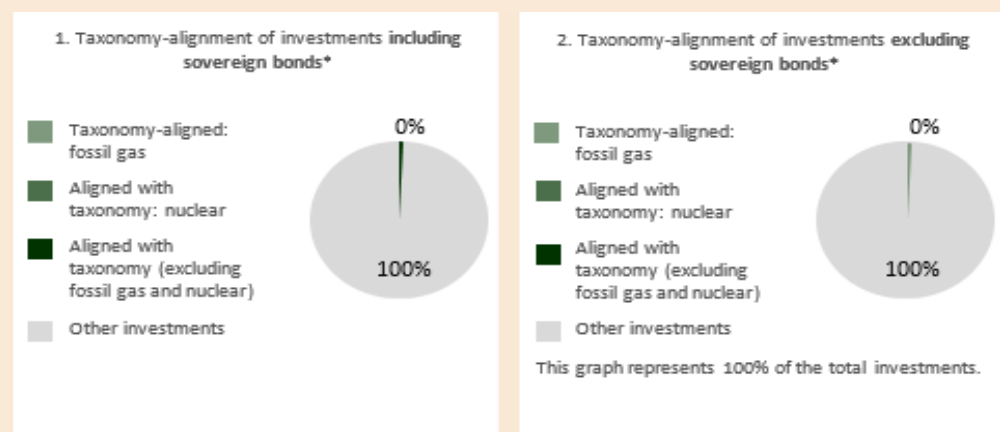


In fossil gas In nuclear energy



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' include all sovereign exposures

⁸ 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 investments in transitional and enabling activities?**

NA



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

The Feeder Fund makes a commitment regarding a minimum proportion of investments in sustainable investments with an environmental objective (1% of the net assets).

In the case of investments by the Master Fund in companies, the Master Fund undertakes to make at least 25% of its investments in companies that meet the sustainable investment criteria, whether the objectives of these investments be environmental or social in nature (commitment of 20% at Feeder Fund level).



What is the minimum share of socially sustainable investments?

The Feeder Fund makes a commitment regarding a minimum proportion of investments in sustainable investments with a social objective (1% of net assets).

In the case of investments by the Master Fund in companies, the Master Fund undertakes to make at least 25% of its investments in companies that meet the sustainable investment criteria, whether the objectives of these investments be environmental or social in nature (commitment of 20% at Feeder Fund level).



What investments are included under ‘#2 Other’ category, what is their purpose and are there any minimum environmental or social safeguards?

At the level of the Feeder Fund, investments included in the ‘#2 Other’ category (not compliant with E/S characteristics) are linked to cash held on an ancillary basis.

At the level of the Master Fund, investments included in the ‘#2 Other’ category (not compliant with the E/S characteristics) are related to derivative instruments used for hedging purposes, cash held on an ancillary basis, or money market instruments such as government bonds.

At the level of the Master Fund, bonds, other international debt securities and short-term negotiable securities from public issuers will be selected through an in-house rating of the issuing country strictly above 2.5 on a scale of 5 (5 being the highest rate), the country being thus considered as sufficiently favourable to sustainable and inclusive development.

Cash and derivatives held for hedging purposes, by nature, are not subject to minimum environmental or social guarantees



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?

There is no 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.



Where can I find more product specific information online?

More product specific information can be found on the website:
<https://fr.sycomore-am.com/fonds/8/sycomore-ls-opportunities>