

**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**

**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.

**Product Name : SYCOMORE EUROPE ECO SOLUTIONS**  
**Legal Entity Identifier : 2221 009T03U3GMOXTL 26**  
**Publication date : 27/02/2026**

## Sustainable investment objective

**Does this financial product have a sustainable investment objective?**

**Yes**

   **No**

<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 65%</b></li> <li><input checked="" type="checkbox"/> In economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 1%</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments</li> <li><input type="checkbox"/> With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> With a social objective</li> <li><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></li> </ul>
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## What is the sustainable investment objective of this financial product?

The Sub-Fund (denominated in EUR) aims to achieve a significant performance over a minimum investment horizon of five years, through a rigorous selection of stocks of companies whose business model, products, services, or production processes positively contribute to the energy and ecological transition challenges, through a thematic SRI strategy.

The Sub-fund will partially make environmentally sustainable investments falling under article 5 of the Taxonomy Regulation (2020/852). Contributing investments can address any of the six environmental objectives set out in article 9 of the Taxonomy Regulation: a) climate change mitigation, b) climate change adaptation, c) sustainable use and protection of water and marine resources, d) transition to a circular economy, e) pollution prevention and control, f) protection and restoration of biodiversity and ecosystems.

It also aims to outperform its benchmark on two ESG indicators detailed in the following question.

No reference benchmark has been designated to meet the sustainable investment objective of the Sub-Fund.

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

The assessment of the achievement of the sustainable investment objective of the Sub-Fund is based in particular on the following sustainability indicators:

- **Investee companies' SPICE<sup>[1]</sup> rating:** SPICE stands for Society & Suppliers, People, Investors, Clients and Environment. This rating assesses the sustainable performance of companies. It integrates the analysis of economic, governance, environmental, social and societal risks and opportunities in business practices and in the products and services offering of companies. The analysis takes into account a set of criteria from which a score between 1 to 5 per letter of SPICE is obtained. These 5 scores are weighted so that environmental issues (SPICE score E), social issues (scores S, P and C) and governance issues (50% of score I) each account for at least 20% of the final score, with the weighting varying by sector.
- The **Net Environmental Contribution (NEC)<sup>[2]</sup>:** The NEC measures the extent to which a company's business model contributes to the ecological transition. The resulting score ranges from -100% for businesses that are highly damaging to the environment, to +100% for companies with a strong positive net impact. Companies associated with a NEC above or equal to the selected threshold therefore make a significant contribution to the ecological transition and the climate change mitigation objectives.
- Specific indicators related to Sycomore AM's definition of sustainable investment, as described in its ESG Integration Policy.

Moreover, as part of the SRI Label, the Sub-Fund undertakes to outperform its financial benchmark on the following two indicators:

- The overall Net Environmental Contribution (NEC);
- Share of investments that have not taken initiatives to reduce their carbon emissions.

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

[1] More information is available in Sycomore AM's ESG Integration Policy, which is accessible on its website: <https://fr.sycomore-am.com/documentation-esg>

[2] The NEC covers five impact categories (issues: climate, waste, biodiversity, water, air quality) by group of activities (contributing areas: ecosystems, energy, mobility, construction, production). More information can be found on the website page indicated at the end of this document.

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

Four elements are implemented to avoid occurrence of significant harm to any environmental or social sustainable investment objective:

- **Management Company's SRI exclusion policy**[3]: Certain activities are considered unsustainable due to their controversial social or environmental impacts, as defined in Sycomore AM's core policy (applicable to all Sycomore AM's direct investments), and in the Socially Responsible Investment Policy (SRI) policy (applicable to all open-ended UCITs, mandates and dedicated funds managed according to an SRI strategy).
- **Companies affected by a severe controversy**[4], identified based on the Investment Manager's thorough analysis of controversies. The most severe controversy classification is considered a violation of one of the principles of the United Nations' Global Compact.
- **Minimum SPICE rating**: The SPICE methodology covers all environmental, social and governance issues targeted by the indicators for adverse impacts on sustainability factors listed within the draft Regulatory Technical Standards. A rating that is too low indicates a potentially weaker sustainability performance on one or more adverse impacts.
- **Sycomore AM's Principal Adverse Impact (PAI) policy**[5]: A PAI policy applied to identify further potential significant harm across environmental and social matters targeted by the PAI indicators listed in Table 1 of Annex I is implemented.

[3] More information is available in Sycomore AM's Exclusion Policy, which is accessible on its website: <https://fr.sycomore-am.com/documentation-esg>

[4] More information is available in Sycomore AM's ESG Integration Policy, which is accessible on its website: <https://fr.sycomore-am.com/documentation-esg>

[5] More information is available in Sycomore AM's Principal Adverse Impact (PAI) Policy, which is accessible on its website: <https://fr.sycomore-am.com/documentation-esg>

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

Adverse impacts on sustainability factors are taken into account as described in the PAI policy of the Management Company.

More specifically, the SPICE methodology covers all environmental, social and governance issues targeted by the indicators for adverse impacts on sustainability factors listed within the Regulatory Technical Standards.

Indeed, **Sycomore AM's fundamental analysis model SPICE**, is an integrated model, allowing to get a holistic view of companies of the investment universe. It was built taking into account OECD guidelines for Multinational Enterprises. It fully integrates ESG factors to capture how companies are managing adverse impacts as well as key sustainable opportunities following a double materiality approach.

**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, anti-corruption and anti-bribery matters.

**Sycomore AM's PAI policy** details how the issues covered by PAIs are covered by SPICE.

Moreover, **Sycomore AM's exclusion policy** targets adverse sustainability impact indicators including controversial weapons, exposure to thermal coal, chemical pesticide production, and more broadly was drafted to target companies in breach of the UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

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

The development of Sycomore AM's analysis framework "SPICE" as well as the exclusion policy have been inspired by the OECD's Guiding Principles for multinational companies, the United Nations' Global Compact, the International Labour Organization's international standards and the UN Guiding Principles on Business and Human Rights. To assess the fundamental value of a company, analysts systematically examine how a firm interacts with its stakeholders. This fundamental analysis is designed to understand strategic challenges, business models, quality of governance and degree of integration of sustainability issues, as well as the risks and opportunities faced by the company. Sycomore AM has also defined its Human Rights Policy in compliance with the UN Guiding Principles on Business and Human Rights.

Despite the above-described due diligence set to detect potential breaches of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, actual compliance of the analyzed issuers can never be guaranteed.



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

Yes,

as indicated in the previous sub-section:

- Principal adverse impacts, as well as all other adverse impacts, are considered for any investment of the portfolio through SPICE analysis and outputs, complemented by Sycomore AM's exclusion policy.
- In addition, to qualify as a sustainable investment, any investment must pass a minimum SPICE score.

Information on principal adverse impacts on sustainability factors shall be made available in the annual report of the Sub-Fund.

No

## What investment strategy does this financial product follow?

The Sub-Fund's selected companies have one or more activities related to energy, transportation and mobility, renovation and construction, circular economy and ecosystems (water, pollution, agriculture, food processing, forestry, fishing...).

These stocks, which at all times represent at least 80% of net assets, are selected from European equity markets, without any sector or capitalisation constraints, based on fundamental analysis. The aim of this stock selection process is to identify quality companies whose market price does not reflect the intrinsic value assessed by the

**The investment strategy** guides investment decisions based on factors such as investment



management team. The process of researching and selecting stocks in the investment universe includes binding extra-financial criteria and overweights companies whose ESG criteria are consistent with sustainability objectives. Please refer to the Sub-Fund's prospectus for more details on the investment strategy.

**The investment strategy of the Sub-Fund fully integrates ESG (Environment, Social (including Human Rights) and Governance) issues. This integration is conducted through the Management Company (Sycomore Asset Management)'s proprietary "SPICE" methodology** introduced above and described in the ESG integration policy available on the website.

We aim at identifying risks and opportunities to which companies are exposed following a double materiality approach, and more specifically:

- On the Environment, the E pillar assesses how companies take into account the preservation of the environment in the management of their activities as well as in their offer of products and services. It also looks at how the environment may affect the company's business. It fully integrates the analysis of the exposure to transition and physical risks;
- On the Social, the P, S and C pillars aim at understanding how companies incorporate risks and opportunities related to human capital, suppliers and clients relationships as well as the society at large. In particular, the respect of working rights, the health and safety of the employees, the quality of the working environment, the societal contribution of the products and services, the capacity of companies to contribute to quality jobs creation and the respect of human rights in the entire value chain of companies are key issues covered through the analysis.
- On the Governance, the I pillar looks at how companies acknowledge the interests of all stakeholders by sharing value equitably. It notably includes the analysis of the governance structure, the alignment of the top management with the strategy as well as the quality of the integration of sustainability issues into the strategy.

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

The following binding criteria apply to the Sub-Fund.

**At investment level**, the Sub-Fund will make sustainable investments based on the following set of selection and exclusion filters, applicable to all investments of the financial product:

- **A filter of selection** dedicated to environmental contribution based on the NEC metric: within the environmental pillar of our SPICE methodology, the **NEC score has to be strictly positive**.
- **An additional filter of selection** is used to identify sustainable investments with either a social objective or an environmental objective. This qualification requires: 1/ the identification of a positive contribution on social or environmental issues based on specific criteria, 2/ the absence of significant damage on other social or environmental issues, 3/ good governance practices. The criteria used to qualify to these three elements are detailed in Sycomore AM's ESG integration policy<sup>[6]</sup>. Among sustainable investments with an environmental objective, the Sub-Fund commits to a minimum share of environmentally sustainable investments as per Taxonomy Regulation. Such investments shall comply with the requirements set out in the Taxonomy Regulation, cumulatively the technical screening criteria involving the substantial contribution to one environmental objective and the do no significant harm criteria, as well as minimum social safeguards.

- **A filter of exclusion:** Companies are excluded if the sustainability risks identified are likely to jeopardize their competitiveness or have a major negative impact. A company is thus excluded if:
  - it is involved in activities identified in Sycomore AM SRI exclusion policy for their controversial social or environmental impacts, or
  - it obtained a SPICE rating below a minimum threshold ensuring PAI consideration, or
  - it is affected by a severe controversy; or
  - it is involved in activities excluded under the Paris-aligned Benchmark (PAB) exclusions (Article 12(1)(a) to (g) of CDR (EU) 2020/1818).
 In case of overlap between two exclusions applied by the Sub-Fund, the stricter threshold shall apply.

As a result of the binding elements, the eligible investment universe is reduced by at least 30% compared to the initial investment universe (as described in the Sub-Fund's prospectus).

**At product level:** the Management Company aims at having a better result compared to the Sub-Fund's benchmark on the two following indicators<sup>[7]</sup>:

- The overall Net Environmental Contribution (NEC);
- Share of investments that have not taken initiatives to reduce their carbon emissions.

The main methodological limits related to the extra-financial approach are:

- the availability of data to conduct ESG analysis;
- the quality of the data used in the assessment of ESG quality and Impact as there are no universal standards related to ESG information and third party verification is not systematic;
- the comparability of data, as not all companies publish the same indicators;
- the use of proprietary methodologies, which relies on the experience and skills of the asset manager's staff

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[6] Link to Sycomore AM's ESG integration policy : <https://en.sycomore-am.com/download/381500688>

[7] Additional non-binding indicators are published annually to monitor the Sub-Fund's performance on environment, governance and human rights. More information can be found on the website page indicated at the end of this document.

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

Governance is part of the SPICE analysis, including a dedicated governance section within the "I" pillar involving a significant focus on governance bodies, and integrating other governance items into the other pillars, notably employee relations and remuneration of staff within the "P" section, and tax practices within the "S" section. Overall governance of issues associated with each type of stakeholder (Society, People, Investors, Clients and the Environment) is addressed in each according pillar.

Requirements to exclude from the investable universe insufficient governance practices from the "G" section, associated with a minimum threshold, can be found in Sycomore AM's exclusion policy.

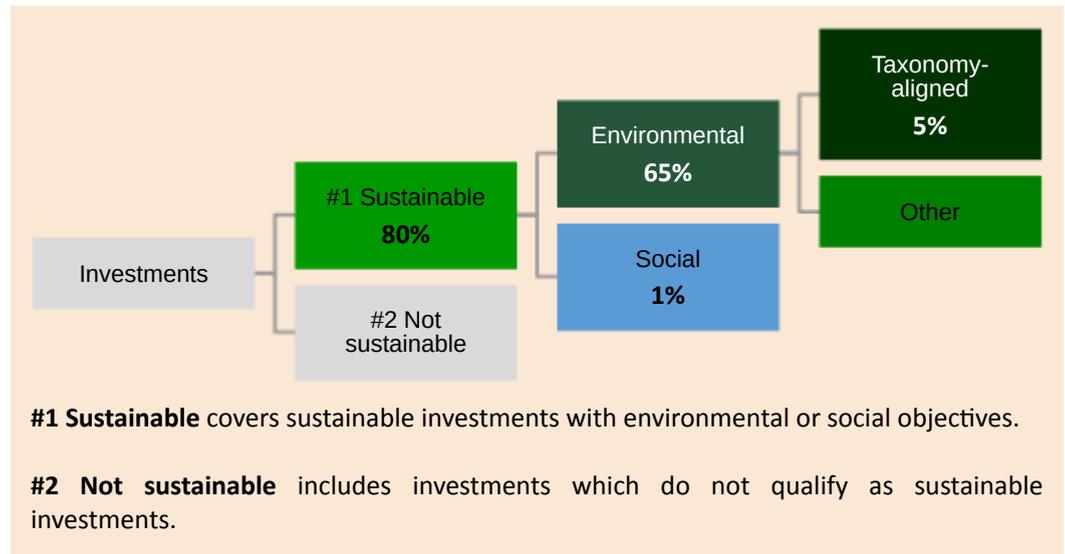
**Good governance** practices include sound management, structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation and the minimum share of sustainable investment?

All the binding criteria described above apply to all the Sub-Fund's investments (excluding cash and derivatives held for hedging purposes).

The following asset allocation figures are pre-contractual minimums expressed as a percentage of net assets; they do not represent a target allocation. For information on actual percentages, please refer to the annual report



### ● *How does the use of derivatives attain the sustainable investment objective ?*

When futures and derivatives are used for exposing the portfolio to the equity markets, they cannot tend to modify the nature of the Sub-Fund, whose investment strategy is focused on companies which contribute to the energy and ecological transition challenges. These themes also form a part of the counterpart's selection process.

The Sub-Fund may not hold a short position in any asset selected as ESG, according to its own method of ESG asset selection.

Apart from efficient and marginal management, the Master Fund's use of derivatives for exposure purposes is necessarily temporary and exceptional.



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

The Sub-Fund aims at making a minimum of 5% of investments into environmentally sustainable investments falling under article 5 of the Taxonomy Regulation (2020/852).

Contributing investments can address any or the six environmental objectives set out in article 9 of the Taxonomy Regulation: a) climate change mitigation, b) climate change adaptation, c) sustainable use and protection of water and marine resources, d) transition to a circular economy, e) pollution prevention and control, f) protection and restoration of biodiversity and ecosystems.

Nonetheless, the quantitative target set in this document, based on best available information to date from underlying companies, is mostly related to the climate change mitigation objective, through renewable energy production for example.

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

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investees 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.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste

management rules.

**Enabling activities**

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

**Transitional activities**

are economic activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

It will be completed going forward as Taxonomy Regulation delegated acts enter into force and that required information is made available by underlyings.

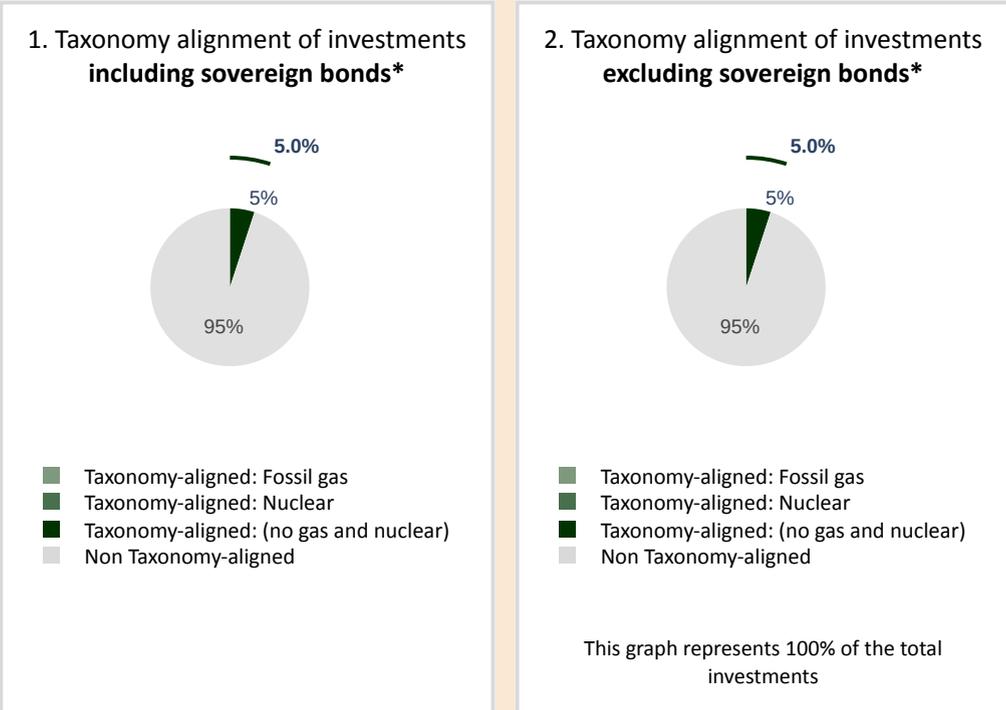
To date the Taxonomy alignment is not subject to an assurance provided by one or more auditors or a review by one or more thirs parties. Nevertheless, the Management Company makes a commitment to do so in regard of the first reporting to come in this regard (i.e in 2024 on the basis of 2023 data) by a reputable independent auditing company.

● **Does this financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup> ?**

- Yes:
  - In fossil gas  In nuclear energy
- No

1. 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 - 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.

**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.

The Sub-Fund does not make any commitment regarding any investment in sovereign bonds. As a consequence, graphical figures presented above include the same percentages for both pie charts (including/excluding sovereign bonds).

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

While the Sub-Fund commits to make a minimum of 5% of sustainable investments within the meaning of the EU Taxonomy, it does not commit to make investments in transitional and enabling activities within the meaning of the EU Taxonomy and the minimum share of such investments is therefore set at 0%.

 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 Sub-Fund will make a minimum of 65% of sustainable investments with an environmental objective.

However, the Sub-Fund commits to invest a minimum of 80% of its net assets (and 100% of investee companies) into sustainable investments, either with an environmental or a social objective.

Sustainable investments with an environmental objective that are not aligned with the EU Taxonomy will be the remaining portion of sustainable investments with an environmental objective (which will make a minimum 65% of net assets), after deduction of sustainable investments with an environmental objective aligned with the EU Taxonomy (which will make a minimum of 5% of net assets).

Two main reasons, inter alia, explain investments with an environmental objective not aligned with the EU Taxonomy:

- Sustainable investments on the one hand are taken as a whole for the purpose of complying with SFDR. Underlyings identified as sustainable investments, based on the criteria described previously, therefore contribute 100% of their portfolio weight to the aggregated sustainable investment total at portfolio level. Environmentally sustainable investments on the other hand, only contribute a certain percentage of their activity, the taxonomy-aligned one assessed based on a breakdown of their revenues, to the aggregated taxonomy-aligned investment total at portfolio level.
- The criterion selected to define positive environmental contribution for the purpose of complying with SFDR can target any of the six environmental objectives of the Taxonomy Regulation.



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

The Sub-Fund will make a minimum of 1% of investments in sustainable investments with a social objective.

However, the Sub-Fund commits to invest a minimum of 80% of its net assets (and 100% of investee companies) into sustainable investments, either with an environmental or a social objective.



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

Investments included under “#2 Not sustainable” relate to derivatives used for hedging purpose, and to cash or cash equivalent (such as sovereign bonds) held as ancillary liquidity.

Bonds, other international debt securities and short-term negotiable securities from public issuers are selected through an in-house rating of the issuing State based on various criteria

(environment, governance, economic health, corruption, human rights, inclusion), enabling the selection of countries considered as sufficiently sustainable and inclusive.

Other cash and cash equivalent used as ancillary liquidity, and derivatives held for hedging purpose, are not subject to any minimum environmental or social safeguards.



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

There is no specific index designated as a reference benchmark to meet 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?***

N/A

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A

- ***How does the designated index differ from a relevant broad market index?***

N/A

- ***Where can the methodology used for the calculation of the designated index be found?***

N/A



**Where can I find more product specific information online? More product specific information can be found on the website:**

<https://en.sycomore-am.com/funds/20/sfs-sycomore-europe-eco-solutions>

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.