

## PRECONTRACTUAL DISCLOSURE

**Product name:**  
Speedinvest - All strategies authorised by the  
mandate<sup>1</sup> ("Product")

**Legal entity identifier:**  
R7CQUF1DQM73HUTV1078

### Environmental and/or social characteristics

**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.

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

☒ ☐ **Yes**

☒ ☐ **No**

☐ It will make a minimum of **sustainable investments with an environmental objective: \_\_\_\_%**

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective: \_\_\_\_%**

☐ It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable 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

☒ It promotes E/S characteristics, but **will not make any sustainable investments**



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

In this Product, in addition to traditional financial criteria, environmental, social and governance (ESG) criteria are used to select investments.

The use of ESG criteria aims to improve the ESG profile of the Product by integrating sustainable development considerations into the selection process. This includes practices such as excluding certain sectors of activity considered to be high-risk in terms of sustainability, such as coal or controversial weapons, or using a rating based on sustainability factors.

<sup>1</sup> "10% bonds / 90% equities"; "20% bonds / 80% equities"; "30% bonds / 70% equities"; "40% bonds / 60% equities"; "50% bonds / 50% equities"; "60% bonds / 40% equities"; "70% bonds / 30% equities"; "80% bonds / 20% equities"; "90% bonds / 10% equities" strategies.

The Product's methodology is based on two main strategies:

- 1) **exclusion**: the exclusion policy applied limits exposure to companies or countries whose activities would not be compatible with the environmental and/or social characteristics promoted (incl. sectors of activity, controversies, non-compliance with the United Nations Global Compact ("UNGC") principles...); and
- 2) **integration**: the integration policy applies a "Best-in Class" strategy to select investments on the basis of their ESG profile.

These criteria reinforce the Product's investment process, which takes into account traditional financial criteria such as geographical and sector diversification.

Finally, no benchmark has been designated to achieve the environmental and/or social characteristics promoted by the Product.

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

Currently, the attainment of the environmental and/or social characteristics promoted by the Product is measured on the basis of the following indicators:

1) **Exclusion policy:**

**The percentage of investments referred to in the following points a) to f) must be 0%:**

- a) **United Nations Global Compact / UNGC** – the Product excludes investments in:
  - companies in breach of the UNGC principles; and
  - investment funds which:
    - either do not apply an exclusion policy on companies in breach of the UNGC principles; or
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies in violation of the UNGC principles;
- b) **Controversial weapons** – the Product excludes investments in:
  - companies linked to controversial arms; and
  - investment funds which:
    - either do not apply an exclusion policy on companies linked to controversial weapons;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies linked to controversial arms;
- c) **Coal** – the Product excludes investments in:
  - companies whose share of coal production or coal-generated electricity exceeds 10% of revenues; and
  - investment funds which :
    - either do not apply an exclusion policy on coal-related companies;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies that derive more than 10% of their revenues from coal-related activities or its sale to external parties;
- d) **Palm oil** – the Product excludes investments in:
  - companies whose share of palm oil production that is not *RSPO - Roundtable on Sustainable Palm Oil* certified exceeds 10% of revenues; and
  - investment funds that :
    - either do not apply an exclusion policy to companies linked to palm oil ;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies that derive more than 5% of their revenues from palm oil production or more than 15% of their revenues from palm oil distribution;

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

- e) **Controversies** – the Product excludes investments in:
- companies exposed to controversies considered “structural” and “very severe”; and
  - investment funds which :
    - either do not apply a policy of excluding companies on the basis of controversy ;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies that are subject to “very severe” environmental, commercial, human rights, labour rights or governance controversies;
- f) **ESG rating** – the Product excludes investments in companies whose ESG rating provided by MSCI (based on its dedicated methodology<sup>2</sup>) is below “BBB”.

## 2) Integration policy:

**ESG rating** – the Product aims for :

- a weighted average ESG rating of at least “AA” for its portfolio part invested in bond investment funds (excluding government bond funds) according to MSCI's dedicated methodology;
- a weighted average ESG rating of at least “A” for its portfolio part invested in bond investment funds (including government bond funds) according to MSCI's dedicated methodology; and
- a weighted average ESG rating of at least “AA” for the portfolio part invested in equity funds according to MSCI's dedicated methodology.

- ***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?***

N/A, the Product does not have a sustainable investment objective.

- ***How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?***

N/A, the Product does not have a sustainable investment objective.

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

In the context of the Product, the following principal adverse impacts (“PAI”) on sustainability factors (taken from the Tables 1 and 2 of the Annex I of the delegated regulation (EU) 2022/1288 of 6 April 2022 (“SFDR DR”) are taken into account:

Indicators applicable to investments in companies		
PAI indicators		Actions taken
Climate and other environment-related indicators		
Greenhouse gas emissions (GHG) Biodiversity	1. GHG emissions	<b>EXCLUSION</b> <ul style="list-style-type: none"> <li>• Exclusion of companies active in sectors with high GHG emissions (incl. coal);</li> </ul>

**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.

<sup>2</sup> MSCI ESG Ratings Methodology, in accordance with which MSCI provides an ESG rating that can be used, sector by sector, to measure each issuer's resilience to long-term ESG risks and opportunities. The ESG scores assigned range from leaders (ESG scores: AAA and AA), to average (ESG ratings: A, BBB and BB) to laggards (ESG ratings: B and CCC). The best-rated issuers (AAA and AA) are the issuers that are considered to most effectively manage the main sustainability risks.

	<b>2. Carbon footprint</b>	<ul style="list-style-type: none"> <li>Exclusion of companies subject to “very severe” environmental, commercial, human rights, labour rights or governance controversies;</li> <li>The MSCI's ESG rating takes these indicators into account.</li> </ul>
	<b>3. GHG intensity of investee companies</b>	
	<b>4. Exposure to companies active in the fossil fuel sector</b>	<b>EXCLUSION</b> <ul style="list-style-type: none"> <li>Exclusion of companies active in sectors with high GHG emissions (incl. coal).</li> </ul>
<b>Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters</b>		
<b>Social and personnel issues</b>	<b>10. Violation of UN Global Compact Guiding (UNGC) principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises</b>	<b>EXCLUSION</b> <ul style="list-style-type: none"> <li>Exclusion of companies that violate the UNGC principles;</li> <li>The MSCI's ESG rating takes this indicator into account.</li> </ul>
	<b>11. Lack of processes and compliance mechanisms to Monitor compliance with the UNGC principles and the OECD Guidelines for Multinational Enterprises</b>	
	<b>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</b>	<b>EXCLUSION</b> <ul style="list-style-type: none"> <li>Exclusion of companies linked to controversial weapons;</li> <li>The MSCI's ESG rating takes this indicator into account.</li> </ul>

<b>Indicators applicable to investments in sovereign and supranational</b>		
<b>PAI indicators</b>		<b>Actions taken</b>
<b>Social</b>	<b>16. Investee countries subject to social violations</b>	<b>EXCLUSION</b> <ul style="list-style-type: none"> <li>Exclusion of investment funds and companies domiciled in countries deemed to be high-risk or subject to sanctions (incl. Sanctions issued by the United Nations Security Council and the Financial Action Task Force).</li> </ul>

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

N/A, the Product does not have a sustainable investment objective.

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 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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

- ☒ Yes, the Product takes into account the PAI on sustainability factors, as detailed in the table included above in the answer given to the question “*How have the indicators for adverse impacts on sustainability factors been taken into account?*”.

The periodic disclosure regarding the PAI on sustainability factors of the Product will be communicated annually to clients in the annex to the portfolio valuation report named: “*Annex to the Portfolio Valuation Report Speedinvest, Periodic disclosure for the financial products referred to in Article 8 of Regulation (EU) 2019/2088 (“SFDR”)*”.

- ☐ No



### What investment strategy does this financial product follow?

As part of the Product's investment process, while respecting the environmental and/or social characteristics promoted, the objective is to achieve medium- and long-term capital growth by investing mainly in international equities and bonds and/or units of investment funds (Undertakings for Collective Investment – UCITs and/or Exchange-Traded Funds – ETFs), themselves invested in international equities and bonds.

The underlying investments are selected according to several criteria:

- 1) the Product follows an investment strategy aimed at providing exposure to international bonds, while ensuring sector and geographical diversification in order to capture the performance of international bond markets;
- 2) the Product nevertheless excludes various investment funds and companies from its investment universe for sustainability reasons. To this end, the Product excludes, directly or indirectly, the following investments which:
  - violate the UNGC principles;
  - are linked to controversial weapons;
  - are linked to coal;
  - are subject to “very severe” environmental, commercial, human rights, labour rights or governance controversies;
  - have an ESG rating below “BBB” according to MSCI's dedicated methodology;
- 3) the Product aims to achieve a weighted average ESG rating of:
  - “AA” for its portfolio part invested in bond investment funds (excluding government bond funds);

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

- “A” for its portfolio part invested in bond investment funds (including government bond funds); and
- “AA” for its portfolio part invested in equity investment funds.

● ***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?***

The constraints defined in the investment strategy for selecting investments to achieve the environmental and/or social characteristics promoted by the Product are as follows:

**1) Exclusion policy:**

**The percentage of investments referred to in the following points a) to f) must be 0%:**

- a) **United Nations Global Compact / UNGC** – the Product excludes investments in:
  - companies in breach of the UNGC principles; and
  - investment funds which:
    - either do not apply an exclusion policy on companies in breach of the UNGC principles; or
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies in violation of the UNGC principles;
- b) **Controversial weapons** – the Product excludes investments in:
  - companies linked to controversial arms; and
  - investment funds which:
    - either do not apply an exclusion policy on companies linked to controversial weapons;
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- d) **Palm oil** – the Product excludes investments in:
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  - investment funds that :
    - either do not apply an exclusion policy to companies linked to palm oil ;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies that derive more than 5% of their revenues from palm oil production or more than 15% of their revenues from palm oil distribution;
- e) **Controversies** – the Product excludes investments in:
  - companies exposed to controversies considered “structural” and “very severe”; and
  - investment funds which :
    - either do not apply a policy of excluding companies on the basis of controversy ;
    - are themselves exposed, on a look-through basis, to more than 1% of their underlying investments in companies that are subject to “very severe” environmental, commercial, human rights, labour rights or governance controversies;



- f) **ESG rating** – the Product excludes investments in companies whose ESG rating provided by MSCI (based on its dedicated methodology) is below “BBB”.

## 2) **Integration policy:**

**ESG rating** – the Product aims for :

- a weighted average ESG rating of at least “AA” for its portfolio part invested in bond investment funds (excluding government bond funds) according to MSCI's dedicated methodology;
- a weighted average ESG rating of at least “A” for its portfolio part invested in bond investment funds (including government bond funds) according to MSCI's dedicated methodology; and
- a weighted average ESG rating of at least “AA” for the portfolio part invested in equity funds according to MSCI's dedicated methodology.

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

No minimum proportion of commitment to reduce the scope of the planned investments has been defined prior to the application of the investment strategy.

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

As part of the Product, a controversies analysis is carried out to assess the good governance practices of the companies invested in.

Social and governance controversies are analysed and assessed on the basis of their severity, their nature and the extent of their impact. This analysis is carried out using data provided by our partner MSCI in application of its dedicated methodology<sup>3</sup>, under which:

- governance-related controversies are grouped into the following four categories: “Fraud and Corruption”, “Controversial Investments”, “Governance Structures” and “Other”; and
- social-related controversies are grouped into seventeen different categories within three sets relating to “Customers”, “Human Rights and Impact on Communities” and “Labour Rights and Supply Chain”.

Any company exposed to controversies deemed “structural” and “very severe” is excluded from the Product's investment universe.

As far as indirect investments are concerned, the investment universe excludes all investment funds that: (i) do not apply a policy of excluding companies on the basis of controversy; or (ii) are themselves exposed to more than 1%, on a look-through basis of their underlying investments, to companies that are the subject of “very severe” controversy in terms of the environment, commercial, human rights, labour rights or governance.

Controversies are also analysed directly by our partner MSCI, which deduces an alignment with the UNGC principles. Companies in violation of these principles are automatically excluded; and investment funds invested in companies in violation of these principles are also excluded.

Finally, the Product also uses an ESG rating provided by MSCI according to its dedicated methodology to select its investments, whether direct or indirect. This ESG rating provides information on how companies manage their ESG risks and opportunities.

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

<sup>3</sup> MSCI ESG Controversies and Global Norms Methodology (lien : <https://www.msci.com/documents/1296102/14524248/ESG-Research-Controversies-Methodology.pdf>).



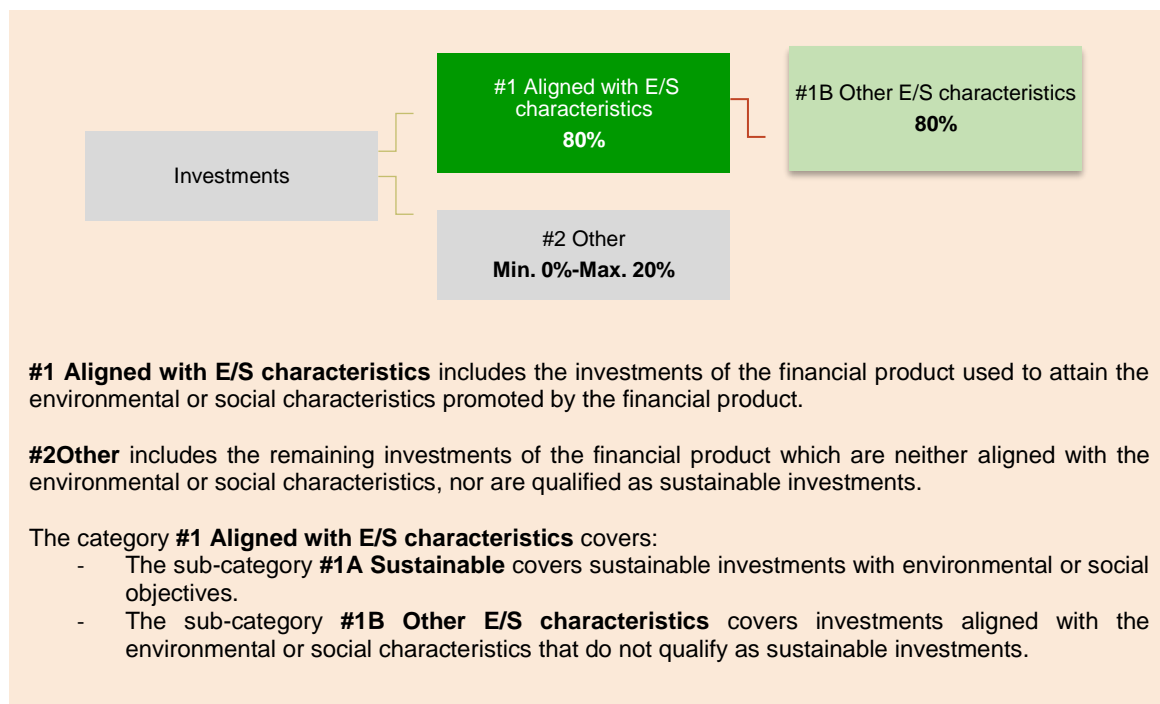
## What is the asset allocation planned for this financial product?

The planned asset allocation is as follows:

**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 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.



The Product invests a minimum of 80% of its net assets in shares of international companies and international bonds, directly or indirectly, which comply with the environmental and/or social characteristics promoted (see category #1 above).

The remaining portfolio part, which is not aligned with the environmental and/or social characteristics promoted, is made up solely of cash which is not invested with a view to sound management of the Product (see category #2 above).

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

No derivatives are intended to be concluded within the Product.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to 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 activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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

0%, the Product does not have a sustainable investment objective and does not target sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

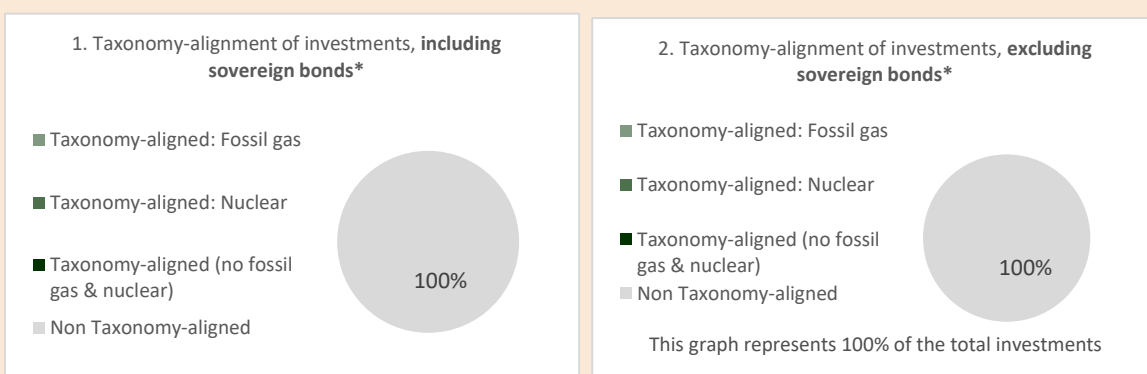
## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>4</sup>?

☐ 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.

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

0%, the Product does not have a minimum share of its investments in transitional and enabling activities.



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?

0%, the Product does not have a sustainable investment objective and does not target sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

<sup>4</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 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.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental and/or social safeguards?**

The investments included under “#2 Other investments” may include: liquidity (necessary for the sound management of the Product). No minimum environmental and/or social safeguards will apply.



**Where can I find more product specific information online?**

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

<https://www.spuerkeess.lu/en/private-customers/saving-and-investing/speedinvest-when-investing-becomes-as-simple-as-saving/sustainability/>