

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:

Legal entity identifier

Willerfunds - Willerfunds - Private Suite - Vontobel Equity Global Impact

549300ZTNGXQ48HUXS18

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

Does this financial product have a sustainable investment objective?

Yes

No

- It will make a minimum of **sustainable investments with an environmental objective: 20%**
 - 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 20%**

- 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 is the sustainable investment objective of this financial product?

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

The Sub-fund sustainable investment objective consists in investing in issuers that contribute to pre-defined so called “Impact Pillars” through their products and services, based pre-determined revenue thresholds and on the Investment Manager’s assessment using a proprietary impact score. The Impact Pillars are: clean water, clean energy, sustainable cities, innovative industries & technology, good health & well-being, sustainable food & agriculture, responsible consumption and equal opportunities. The targeted companies provide products and services along the whole value chain, which are designed to tackle today’s pressing environmental and social problems i.e., environmental pollution, climate change, technological advances, population growth, urbanization and rising inequalities.

The Investment Manager aims to partially invest in companies that contribute, amongst other, to the following EU Taxonomy aligned objectives: climate change adaptation and transition to a circular economy.

No reference benchmark has been designated for the purpose of attaining the sustainable

investment objective.

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

The Investment Manager's sustainability investment process consists of detailed, systematic qualitative and quantitative analysis of a potential investee. The Investment Manager uses the following sustainability indicators to measure the attainment of the Sub-fund's sustainable investment objective:

- Percentage of company's revenue derived from economic activities that contribute to at least one of the Impact Pillars.
- Percentage of investments in sustainable investments, by Impact Pillars.
- Investee companies Impact Strategy Score (as defined below).
- Percentage of investments in issuers with an ESG score below the minimum threshold set for this Sub-fund.
- Percentage of investments in issuers involved in activities excluded by the Sub-fund.
- Percentage of investments in issuers that are in violation with certain international norms and standards promoted by the Sub-fund or that are exposed to severe controversies (without positive outlook).

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

In order to ensure that the sustainable investments that Sub-fund intends to make do not cause significant harm to any environmental or social investment objective, the Sub-fund implements a screening and exclusion approach as further described below, takes into account all the mandatory indicators for adverse impacts and ensures that the Sub-fund's investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as further outlined below.

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

The Investment Manager takes into account all the mandatory adverse impacts indicators of Table 1 of Annex 1 of Commission Delegated Regulation (EU) 2022/1288 (the "SFDR RTS") and any relevant additional indicators in Tables 2 and 3 of the SFDR RTS by applying the following process:

- The Investment Manager identifies investments that are exposed to principal adverse impacts on sustainability factors against pre-determined thresholds based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. Where no reliable third-party data is available, the Management Company may make reasonable estimates or assumptions.
- Where the Investment Manager identifies an investment as critical in one of the considered principal adverse impacts areas by exceeding the pre-set threshold(s), and where no signs of improvement have been observed, an action must be taken within a reasonable period of time. Action mechanisms include: exclusion, engagement, tilting.

— → *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 Sub-fund has a controversy monitoring process in place, that among others takes into account the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This process is based on third party data and may be complemented by the Investment Manager own ESG research capabilities.

The Sub-fund excludes issuers that are:

- (i) in violation with the norms and standards (defined under the investment strategy section) promoted by the Sub-fund,
- (ii) involved in severe controversies.

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.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).



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

- Yes, the Investment Manager considers the adverse impacts on sustainability factors by applying the following process:

The Investment Manager identifies investments that are exposed to principal adverse impacts on sustainability factors against pre-determined thresholds, based on in-house research; data sources include ESG data providers, news alerts, and the issuers themselves. Where no reliable third-party data is available, the Investment Manager may make reasonable estimates or assumptions.

Where the Investment Manager identifies an investment as critical in one of the considered principal adverse impacts areas by exceeding the pre-set threshold(s), and where no signs of improvement have been observed, an action must be taken within a reasonable period of time. Action mechanisms include: exclusion, engagement, use of voting rights, tilting.

Information on how principal adverse impacts on sustainability factors were considered will be made available in the periodic reporting of the Sub-fund.

No



What investment strategy does this financial product follow?

The Sub-fund invests in issuers that contribute to the Impact Pillars through their products and services. The Impact Pillars are mapped to the UN Sustainable Development Goals (“SDGs”). In order to qualify for investment:

- the investee companies must have a positive contribution to at least one of the Impact Pillars where the company must derive at least 20% of its revenues from economic activities that contribute to at least one of the Impact Pillars;
- the investee companies must have a positive impact strategy score (“Impact Strategy Score”). The Investment Manager systematically assess the investee companies impact strategies, based on a qualitative scoring of six criteria (score from -3 to +3), reflecting the benefits linked to an investee company’s strategy, also relative to peers or similar industries. These six scores aggregate to an overall Impact Strategy Score for each company.

Additionally, the Sub-fund applies the following approaches:

1. Screening approach:

The Sub-fund invests in issuers that the Investment Manager considers as demonstrating a superior ESG score. Investee companies will be screened based on a minimum ESG score, which is provided by a third-party data provider.

2. Exclusion approach:

The Sub-fund applies certain exclusion criteria with regards to products and activities related to: unconventional / controversial weapons, nuclear weapons, coal (extraction and power plants), unconventional oil and gas, nuclear energy, tobacco, adult entertainment, alcohol, gambling, animal testing, fur, palm oil. Such involvement is measured by the revenues an issuer derives from such activities. The Investment Manager considers that a company is involved in such activities when it derives a non-marginal part of its revenues from these activities. Exceptions may apply, if the company has a clear strategy to exit from these activities (e.g., through investments in other energy sources, strategy to decrease CO2 intensity).

3. Severe controversies monitoring:

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

The Sub-fund promotes the adherence with certain international norms and standards, i.e., UN Global Compact, OECD guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, ILO guidelines, UN conventions, by excluding issuers that are:

- (i) in violation with these norms and standards,
- (ii) that are involved in severe controversies.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).

The securities will be analyzed based on the binding elements prior to investment and monitored on a continuous basis. Each asset in the portfolio has their sustainability performance periodically revaluated using the above-described sustainability framework. If a company does not comply with the criteria described below, the Investment Manager divests from such a company within a time period to be determined by the Investment Manager without exceeding in principle three months after such breach was detected, considering prevailing market conditions and taking due account of the best interests of the shareholders. The Investment Manager may decide to further postpone the rectification of such a breach or decide to carry out the divestment in several instalments over a longer period of time in exceptional cases, provided this is considered to be in the best interests of the shareholders.

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

- The Sub-fund makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Investment Manager's methodology for selecting sustainable investments.
- Through the implementation of the process described above, the Sub-fund excludes at least 20% of the investment universe (global listed equity markets).
- The Sub-fund excludes issuers that derive a non-marginal part of their revenues from products/activities to those listed in the exclusion list.
- The Sub-fund excludes issuers in violation of UN Global Compact Principles, UN Conventions, OECD Guidelines for Multinational Enterprises unless a positive outlook is identified.
- The Sub-fund excludes issuers that are exposed to severe controversies unless a positive outlook is identified.
- The Sub-fund invests in issuers that have a positive Impact Strategy Score.
- The Sub-fund invests in issuers that derive at least 20% of their revenue from economic activities that contribute to at least one of the Impact Pillars.

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

The Investment Manager will assess investee companies' good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance, by applying a severe controversies monitoring process.

The Sub-fund excludes issuers that are:

- (i) in violation with the norms and standards promoted by the Sub-fund, or
- (ii) that are involved in severe controversies, including those related to governance matters.

Unless, in either case, the Investment Manager has not identified a positive outlook (i.e., through proactive response by the issuer, proportionate rectification measures already announced or taken, or through active ownership activities with reasonable promise of successful outcomes).

Active ownership activities: The Sub-fund further intends to ensure good governance of the investee companies via active ownership. The Investment Manager puts best effort in engaging with regards to ESG policies and to promote sustainability awareness.

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 investments?

Asset allocation describes the share of investments in specific assets.

The Sub-fund is expected to invest at least 80% of its NAV in companies that qualify as sustainable investments (#1 Sustainable).

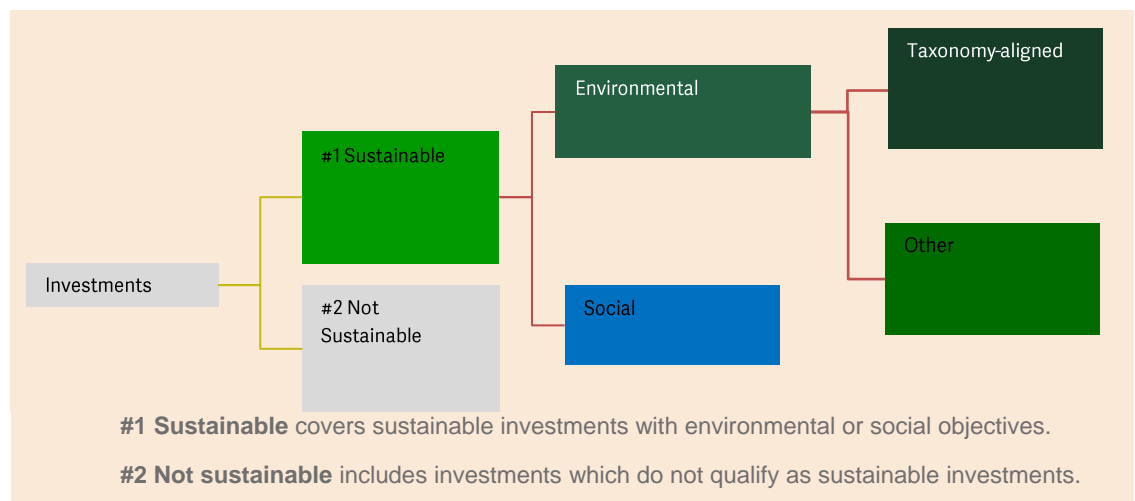
The Sub-fund is expected to invest at least 20% of its NAV in sustainable investments with an environmental objective (Environmental), and at least 20% of its NAV in sustainable investment with social objective (Social).

The Sub-fund is allowed to invest up to 20% of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Not Sustainable).

The ESG analysis coverage, based on the above-mentioned indicators (where relevant), will be guaranteed for at least 100% of the Sub-fund's securities. The use of data may be subject to methodological limits.

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?**

Not applicable, derivatives are not used for the purpose of attaining the sustainable investment objective of the Sub-fund.



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

It is expected that at least 5% of the Sub-fund's investments will be considered as Taxonomy-aligned (contributing to amongst other the following EU Taxonomy aligned objective: climate change adaptation and transition to a circular economy) and hence will comply with the technical screening criteria specific to the economic activity at hand. As the Sub-fund will solely invest in investee companies, none of the

investments will consist of sovereign exposures.

The Taxonomy alignment of the investment is calculated by turnover.

The information of the Taxonomy alignment will be provided by a third-party data provider, which might be augmented by information gathered by the Investment Manager through their proprietary research analysis.

At this moment, compliance with the EU Taxonomy will not be subject to a review by auditors nor by third parties.

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

Yes

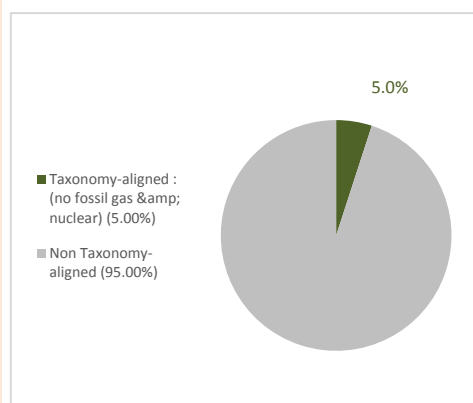
In fossil gas In nuclear energy

No

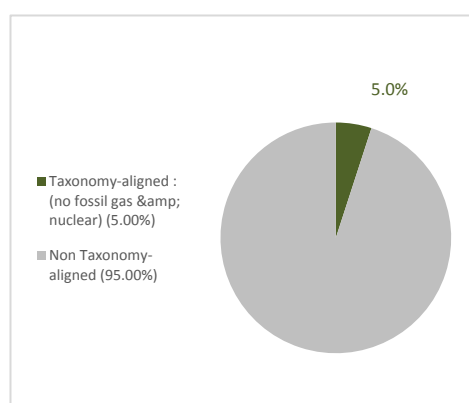
¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas 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.*

1. Taxonomy alignment of investments including sovereign bonds*



2. Taxonomy alignment of investments excluding sovereign bonds*



This graph represents 5 % of the total investments.

*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

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

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

The Sub-fund will invest at least 1% in enabling activities but does not seek particular exposure to transitional activities.

others have greenhouse gas emission levels corresponding to the best performance.



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

The Sub-fund will partially invest in environmentally sustainable investments, as defined by the EU Taxonomy. However, the Sub-fund also invests in sustainable investments that are not aligned with the criteria set out by the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Sub-fund underlying sustainable investments which take into account the EU criteria for environmentally sustainable economic activities.



are environmentally sustainable investments 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 a social objective?

The Sub-fund's minimum share of socially sustainable investments will be at least 20% of the Sub-fund's assets



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

The Sub-fund may hold ancillary liquidity and use financial derivative instruments for the purpose of hedging. While these instruments are not expected to detrimentally affect the attainment of the Sub-fund's sustainable investment objective, no minimum environmental or social safeguards are applied.



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

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

Reference benchmarks 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:

http://www.fideuramireland.ie/en/legal_documentation

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf

Please also refer to Management Company's Policy for a description of the rules that discipline the integration of ESG factors and the consideration of sustainability risk, in accordance with the requirements of the current legislation, where the financial management of a product is delegated to third-party fund houses. Further details on the sustainability indicators approach, as may be updated from time to time, adopted are set out at:

https://am.vontobel.com/document/84023217-cfe4-48ed-a4ac-fcd747280cf8/Sustainable-Investing-and-Advisory-Policy_20210309_EN.pdf