



Sustainable Finance Disclosure Regulation (SFDR) website disclosure

Environmental or social characteristics promoted by the financial products

The following funds comply with **article 9 SFDR** as they have sustainable objectives:

- Luxembourg Selection Fund Active Solar (“Active Solar”)
- Global Managers Platform Active Recycling (“Active Recycling”)

The disclosure information in the following pages (2. to 5.) relate to both funds.

The following funds are classified **article 6 SFDR** as they are explicitly declared as non-sustainable:

- Global Managers Platform Quantis Low Volatility
- Global Managers Platform Quantis Dynamic Equity
- Global Managers Platform Behaviour European Equities
- Alternative Investment Platform Master Volatility

Sustainability-related disclosures

No significant harm to the sustainable investment objective

To assess whether the Subfund’s investments do no significant harm, the Portfolio Manager applies the indicators as mentioned in the Annex 1 of the prospectus. The calculation of these indicators is based on the disclosures of the investee companies.

In addition, the Portfolio Manager screens the target companies against sanctions lists, negative news, and controversies.

Sustainable investment objective of the financial product

The Subfund has a sustainable investment objective to contribute to the stabilisation of greenhouse gas concentrations through the avoidance and/or reduction of greenhouse gas emissions. In particular, the Subfund’s primary environmental objective in the framework of the Taxonomy Regulation is Climate Change Mitigation.

The approach adopted by the Subfund is that solar energy is one of the least polluting sources of energy. When power is generated by a solar installation, it reduces the greenhouse gas emissions, because electric power is not generated by a more polluting source of energy. Hence, by investing in companies throughout the solar value chain, the Subfund contributes to the sustainable investment objective of stabilisation of greenhouse gas concentrations.

Investment strategy

The strategy of the Subfund is to invest in the best companies in the solar sector based on a detailed fundamental analysis and on the exclusion of companies with material ESG risk with respect to the indicators listed below. The strategy of the Subfund is not limited to a single type of technology or to a single market. Instead, it seeks to identify the leaders in each of the segments and each of the steps of the value chain to identify suitable investment opportunities that do not significantly harm as specified in the Regulations (EU) 2019/2088 and (EU) 2020/852.

The Portfolio Manager applies its fundamental analysis and a proprietary ESG Risk assessment that combines multiple ESG data sources from internal and recognized external providers to all the companies making up the Subfund’s investment universe. The detailed ESG Risk scoring is conducted in house before making any investment decision and is based on the following sustainability indicators:

- a) Environmental indicators: sustainability of supply chain / energy usage / water usage / direct GHG emissions / global carbon footprint / waste management.
- b) Social indicators: responsible employer / health and safety / impact on communities.
- c) Governance indicators: governance structure / board of directors / risk management / code of ethics.

Each sustainability indicator is graded on a scale of -1 to +1, and then weighted according to its relative importance in valuing the company. Each company is then given a score that will define its position in the Subfund as per below score cards:

- Score of 0 to +1 = company can be allocated to the portfolio
- Score between -0.5 and 0 can be allocated to the portfolio but company will be removed if it has not improved after a year.
- Score of below -0.5 is excluded from the investments.

In addition, to reach the environmentally sustainable objective of the Subfund, greenhouse gas emissions of investee companies will be measured and will need to decrease over time to reach net zero by 2040. The environmental, social and governance (ESG) fundamental analysis and screening is applied to 100% of the equity positions of the Subfund’s portfolio.

Proportion of investments

The Subfund's minimum percentage of sustainable investments with environmental objective is 80%. The Subfund may invest up to 20% of its total assets in other investments. From the portion of environmentally sustainable investments, a minimum of 60% of the assets are Taxonomy- aligned, which represent a minimum of 48% of the Subfund's total investments.

Monitoring of sustainable investment objective

The monitoring is made through the detailed analysis of the relevant sustainability indicators (see Methodologies) and their evolution over time. The analysis and rating of the sustainability indicators is updated at least once a year.

Methodologies

The methodology of a fundamental analysis is applied to all the companies making up the investment universe. This procedure considers both macroeconomic and microeconomic factors and integrates a risk assessment of the companies through a rating of the companies in a scorecard taking into account the sustainability indicators mentioned above.

To measure the attainment of the above investment objective, the Portfolio Manager focuses on the same sustainability indicators as mentioned above as well as the taxonomy alignment of the investments.

Data sources & processing

The Portfolio Manager mainly relies on the data provided by the companies. Most relevant data are released within the following types of reporting: Sustainability report, Environmental Social and Governance (ESG) report, Corporate Social Responsibility (CSR) report and Annual Financial report. In addition, the Portfolio Manager sources data from external data providers with global ESG data coverage, as well as from the certifications or labelling that some companies might have.

Limitations to methodologies and data

Accuracy of data is dependent on 3rd party providers such as the underlying companies and the coverage of data sources can be less than 100% due to incomplete or inconsistent data and gaps in the coverage of these 3rd party providers. In order to mitigate these limitations, the Portfolio Manager has subscribed to the services of a global sustainability technology platform that uses machine learning and big data to deliver ESG insights.

Due diligence

Due diligence is carried out on in-house analysis and controls and data providers. The sustainable investment objective and risks are considered as part of the investment selection process.

Engagement policies

Information on the proxy voting policy, which will be performed by UBS Asset Management AG, can be found here: <https://www.ubs.com/global/en/assetmanagement/capabilities/sustainable-investing.html>

Information on the engagement policy, which will be performed by the Portfolio Manager, can be found here: <https://www.activenf.ch>

Attainment of the sustainable investment objective

The Subfund does not use a reference benchmark from an SFDR point of view.

Global Managers Platform – Active Recycling (the “Sub-fund”)

Sustainability-related disclosures

No significant harm to the sustainable investment objective

To assess whether the Sub-fund’s investments do no significant harm, the Investment Manager applies the indicators as mentioned in Appendix I of the prospectus “Sub-funds SFDR and Taxonomy Disclosures.”

The calculation of these indicators is based on the disclosures of the investee companies.

In addition, the Investment Manager screens the target companies against sanctions lists, negative news, and controversies.

Sustainable investment objective of the financial product

The sustainable investment objective of the Sub-fund is environmental. From a Taxonomy Regulation point of view, the specific environmental objectives are contribution to “the transition to circular economy” as well as “pollution prevention and control.”

Through sustainable investment objectives, the aim of the Sub-Fund is to achieve long-term capital growth by investing in shares of companies active in the waste recycling industry.

Investment strategy

The strategy of the Sub-fund is to invest in the best companies in the recycling sector based on a detailed fundamental analysis and on the exclusion of companies with material ESG risk with respect to the indicators listed below. The strategy of the Sub-fund is not limited to a single type of technology or to a single market. Instead, it seeks to identify the leaders in each of the segments (industrial and household waste, treatment of wastewater, glass, ferrous and non-ferrous metals, wood and paper, manufactured goods, batteries, etc.) and each of the steps of the value chain in order to identify suitable investment opportunities that do not significantly harm as specified in the Regulations (EU) 2019/2088 and (EU) 2020/852.

The Investment Manager applies a proprietary ESG Risk assessment that combines multiple ESG data sources from internal and recognized external providers to identify companies with material ESG risks. The detailed internal ESG scoring is conducted in house before making any investment decision.

The Investment Manager applies its fundamental analysis to all the companies making up the Sub-fund’s investment universe and integrates a sustainability risk assessment based on the following sustainability indicators:

- a) Environmental indicators: sustainability of supply chain / energy usage / water usage / direct GHG emissions / global carbon footprint / waste management.
- b) Social indicators: responsible employer / health and safety / impact on communities.
- c) Governance indicators: governance structure / board of directors / risk management / code of ethics.

Each sustainability indicator is graded on a scale of -1 to +1, and then weighted according to its relative importance in valuing the company. Each company is then given a score that will define its position in the Sub-fund as per below score cards:

- Score of 0 to +1 = company can be allocated to the portfolio.
- Score between -0.5 and 0 can be allocated to the portfolio but company will be removed if it has not improved after a year.
- Score of below -0.5 is excluded from the investments.

The environmental, social and governance (ESG) fundamental analysis and screening is applied to 100% of the equity positions of the Sub-fund’s portfolio.

Proportion of investments

The Sub-fund’s minimum percentage of sustainable investments with environmental objective is 70%. The Sub-fund may invest up to 30% of its total assets in other investments. Under the current framework provided by the Taxonomy

Regulation, which provides technical screening criteria only for climate change mitigation and climate change adaptation objectives, none of the sustainable investments with an environmental objective are currently aligned with the EU Taxonomy, as none of the Sub-fund's investments are contributing substantially to the objectives of climate change mitigation or climate change adaptation.

As the sustainable investment objectives of the Sub-Fund is to contribute to (i) transition to a circular economy and (ii) pollution prevention and control, the Investment Managers strives to meet or demonstrate progress towards the Taxonomy-related disclosures and will reassess the proportion of alignment of the sustainable investments with the EU Taxonomy when the technical screening criteria for the above-mentioned objectives will be applicable.

Monitoring of sustainable investment objective

The monitoring is made through the detailed analysis of the relevant sustainability indicators (see Methodologies) and their evolution over time. The analysis and rating of the sustainability indicators is updated at least once a year or as needed.

Methodologies

The methodology of a fundamental analysis is applied to all the companies making up the investment universe. This process considers both macroeconomic and microeconomic factors and integrates a risk assessment of the companies through a rating of the companies in a scorecard considering the sustainability indicators mentioned above.

To measure the attainment of the above investment objective, the Investment Manager focuses on the same sustainability indicators as mentioned above as well as the taxonomy alignment of the investments.

Data sources & processing

The Investment Manager mainly relies on the data provided by the companies. Most relevant data are released within the following types of reporting: Sustainability report, Environmental Social and Governance (ESG) report, Corporate Social Responsibility (CSR) report and Annual Financial report. In addition, the Investment Manager sources data from external data providers with global ESG data coverage, as well as from the certifications or labelling that some companies might have.

Limitations to methodologies and data

Accuracy of data is dependent on 3rd party providers such as the underlying companies and the coverage of data sources can be less than 100% due to incomplete or inconsistent data and gaps in the coverage of these 3rd party providers. In order to mitigate these limitations, the Investment Manager has subscribed to the services of a global sustainability technology platform that uses machine learning and big data to deliver ESG insights.

Due diligence

Due diligence is carried out on in-house analysis and controls and data providers. The sustainable investment objective and risks are considered as part of the investment selection process.

Engagement policies

Information on the engagement policy, which will be performed by the Investment Manager, can be found here: <https://www.activenf.ch>

Attainment of the sustainable investment objective

The Sub-fund does not use a reference benchmark from an SFDR point of view.