

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: AZ Equity - Europe

Legal entity identifier: 549300QIXOWXRE8BEW12

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

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 and 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

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

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

The Sub-fund promotes environmental and social characteristics by integrating ESG (environmental, social and governance) factors into the investment process. As stated by the United Nations Principles for Responsible Investment (the “UN PRI”), ESG integration is “the systematic and explicit inclusion of material ESG factors in investment analysis and investment decisions”.

The integration of ESG factors has a positive impact on the environment and society, as companies with the best environmental and social practices are favoured over those with lower standards.

Companies with the highest ratings on the environmental pillar tend to adopt better standards and pay close attention to issues such as: prevention of climate change (e.g. in terms of reduced carbon emissions, carbon footprint, vulnerability to climate change); natural resources (e.g. in terms of water stress, biodiversity and land use); pollution and waste prevention (in relation to emissions and toxic waste; packaging materials and waste; electronic waste); environmental opportunities (in clean technologies; in renewable energy).

Companies with the highest ratings on the social pillar tend to adopt better standards and pay close attention to issues such as: human capital (labour management; health and safety; human capital development; supply chain labour standards); product responsibility (product safety and quality; chemical safety; consumer financial protection; confidentiality and data security; responsible investment; health and demographic risks); social opportunities (access to communications; access to finance; access to health care; opportunities in nutrition and health); stakeholder opposition (controversial procurement; community relations).

In addition to the positive environmental and social impacts, ESG integration also leads to better long-term financial returns on investments, as well as higher risk-adjusted returns and long-term profitability. Since companies with good ESG practices have higher revenue and profit growth, lower volatility, higher productivity and lower costs, they are less exposed to regulatory risks, fines and penalties.

In addition, the Sub-fund promotes environmental and social characteristics by excluding any investment in companies operating in sectors considered unsustainable by the Manager and/or which may involve significant environmental and social risks.

No benchmark has been designated to achieve the environmental or social characteristics promoted by the Sub-fund.

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

The achievement of the environmental or social characteristics promoted shall be measured by the following sustainability indicators:

- the absence of investments in assets that are on the exclusion list as a result of the exclusion policy. The Manager undertakes to avoid investments in companies operating in sectors that are considered unsustainable and/or that may involve significant environmental and social risks (such as, among others, controversial weapons and tobacco). Additional information is available in the Manager’s ESG Policy available at the following link: <https://www.azimutinvestments.com/policies-and-documents>;

- The weighted average ESG score of the portfolio. The ESG score is monitored, both at the level of each investment and on an aggregate basis. The environmental, social and governance scores of each investment are considered in addition to traditional analysis and evaluation criteria. For this Sub-fund, the average ESG rating at the portfolio level must always be equal to or greater than BBB. The ESG rating is calculated using MSCI ESG Research data and methodology. Thus, the Manager ensures that the Sub-fund is financially efficient and as sustainable as possible on an ongoing basis. Additional information is available in the Manager's ESG Policy available at the following link: <https://www.azimutinvestments.com/policies-and-documents>;
- consideration of the negative impacts on sustainability ("PAIs").

● ***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 Sub-fund promotes environmental and social characteristics, but it does not commit to investing in sustainable investments within the meaning of Art. 2(17) of Regulation 2019/2088.

● ***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?***

Not applicable.

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

Not applicable.

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

Not applicable.



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

☐ No

☒ Yes,

While all mandatory PAIs are calculated and monitored, the Manager has focused on prioritising a specific subset of PAIs, which may increase over time.

**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.

Additional information on the PAIs taken into account is available on the Management Company's website.

The Sub-fund Manager continuously monitors PAI data through an ad hoc tool where PAI values can be viewed at both position and aggregate level, in order to be considered in the investment decision-making process in the same way as ESG scores and traditional financial measures. However, given the still limited availability of reliable data on many PAIs, the high variability of PAIs at sectoral and geographical level, and their retrospective nature, no strict threshold or limit is set.

The first reason why no strict limit is set for PAIs is that at present, the percentage of companies reporting PAIs is sometimes still very low and it is reasonable to expect that new companies will start reporting PAI data in the future. Since portfolio-level PAIs are only calculated on companies that publish relevant data, it is possible that over time, the value of portfolio-level PAIs will increase as companies begin to report their data. In this case, the increase in the value of PAIs at the portfolio level does not necessarily mean that the portfolio is invested in companies with greater negative impacts, but rather that it is simply an effect of the increased hedging. The Manager must therefore assess the evolution of PAIs, taking into account the distortive effect caused by increased hedging.

Another reason why strict limits have not been set for PAIs is that focusing only on the absolute value of the PAI can lead to sub-optimal choices in terms of sustainability, especially if companies have embarked on a path of improving their practices, because PAIs are specifically a retrospective indicator. The greatest reduction in negative impacts is possible precisely by encouraging companies which currently have low operating standards and therefore high negative impacts, to improve their practices by supporting them financially in the transition, and by exercising our duty as a responsible investor and guiding the strategic business decisions of the beneficiary companies through active participation in a way that (among other things) reduces the negative impacts of the companies.

To this end, the Management Company has engaged Institutional Shareholder Services, Inc. ("ISS"), an independent proxy voting service provider. ISS provides research, voting recommendations and voting support to the Management Company. The Management Company has subscribed to ISS' "Sustainability Policy" which is specifically designated for UN PRI signatories. Thanks to its partnership with ISS, the Management Company is able to vote at shareholder meetings of the companies in which it invests. As ISS' Sustainability Policy is consistent with UN PRI, votes in each resolution are cast in a way that encourages invested companies to adopt higher standards, improve their practices and minimise environmental and societal PAIs.

It is also possible that, over the years, companies benefiting from an investment experience cases where one or more of their PAIs increase rather than decrease. The Manager therefore assesses the PAIs first at the global level to determine the overall sustainability trajectory of the company, and then for each PAI separately.

In addition, exclusion criteria are applied to a subset of PAIs. More information is available on the [website](#).

Information on the PAIs on sustainability factors will be available in the Sub-fund's annual report.



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

## What investment strategy does this financial product follow?

The Sub-fund aims to achieve capital appreciation by investing primarily in shares and similar securities of companies of any market capitalisation domiciled in Europe or listed on a European regulated stock exchange, with an active selection of securities motivated by investment factors such as growth, relative value, quality and momentum.

Additional information on the general investment strategy and on the investment policy and restrictions of the Sub-fund can be found in Appendix I of the Prospectus.

In addition to traditional financial analysis, the following activities, focusing on environmental and social characteristics, are an integral part of the investment process:

### **ESG integration**

The environmental, social and governance scores of each individual investment are taken into account alongside traditional analytical and evaluation criteria, both at the level of each security and on a global basis. This objective is achieved through optimisation that mainly consists of disregarding and/or reducing positions with the lowest ESG scores, preferring companies with higher ESG scores.

### **Exclusion list**

Investments in companies operating in sectors that are considered unsustainable and/or may involve significant environmental and social risks (such as controversial weapons and tobacco) are not allowed where the share of turnover from these activities exceeds a specific threshold (Indicated in the Management Company's ESG Policy).

Further information is available at <https://www.azimutinvestments.com/sustainable>.

### **Active shareholding**

The Management Company exercises its duty as a responsible investor by using proxy voting and engagement with management to encourage companies receiving investments to adopt sustainable environmental, social and governance practices.

In order to strengthen its ability to actively engage, participate in shareholder meetings and exercise its voting rights, the Management Company has engaged Institutional Shareholder Services, Inc. ("ISS"), an independent third party proxy voting service provider. ISS provides research, voting recommendations and voting support to the Management Company. The Management Company has subscribed to ISS' "Sustainability Policy" which is specifically designated for PRI signatories.

### **Consideration of PAIs**

The negative impact of investments on sustainability factors is calculated and monitored, focusing on a specific subset of PAIs. The Manager assesses the subset of PAIs considered first at the global level to determine the overall sustainability trajectory of the company, and then for each PAI separately.

- ***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?***

#### **ESG integration**

- Investments aligned with the environmental and social characteristics promoted by the Sub-fund are those with a minimum score equal to or greater than “BB” (in the following ascending order: CCC, B, **BB**, BBB, A, AA, AAA) for the “Environmental” or “Social” pillar. The rating is calculated from the MSCI ESG Research data and methodology.
- The portfolio of the Sub-fund has a minimum weighted average score of “BBB”. The rating is calculated from the MSCI ESG Research data and methodology.

#### **Exclusion list**

- The Sub-fund complies with the Exclusion Policy. According to this policy, investments in companies operating in sectors that are considered unsustainable and/or that may involve significant environmental and social risks (such as, among others, controversial weapons and tobacco) are not allowed when the specific turnover threshold specified in the information published on the [website](#) is exceeded.

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

The Sub-fund does not commit to a minimum percentage to reduce its investment universe prior to the application of its investment strategy.

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

The assessment of good governance practices is a central pillar of the investment process adopted by the Manager and consists in ensuring that the governance of each company benefiting from an investment is based on rules of conduct aligned with international best practices and inspired by consideration of the interests of all stakeholders, including through a remuneration policy.

The Manager applies a binding element, consisting of a score equal to or greater than “BB” for the Governance pillar of the companies receiving investments (considering the following scale: CCC, B, **BB**, BBB, A, AA, AAA). This rating is calculated from the MSCI ESG Research data and methodology. In addition, companies benefiting from investments marked with a red flag, for which the assessment of direct involvement in the most serious negative impacts shows that these have not yet been mitigated to the satisfaction of all stakeholders involved, are excluded from the scope of investment.

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



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

In accordance with the binding elements of the investment strategy adopted to promote environmental and social characteristics, the minimum proportion of investments aligned with environmental and social characteristics (#1 Aligned with E/S characteristics) is at least 50% of the portfolio.

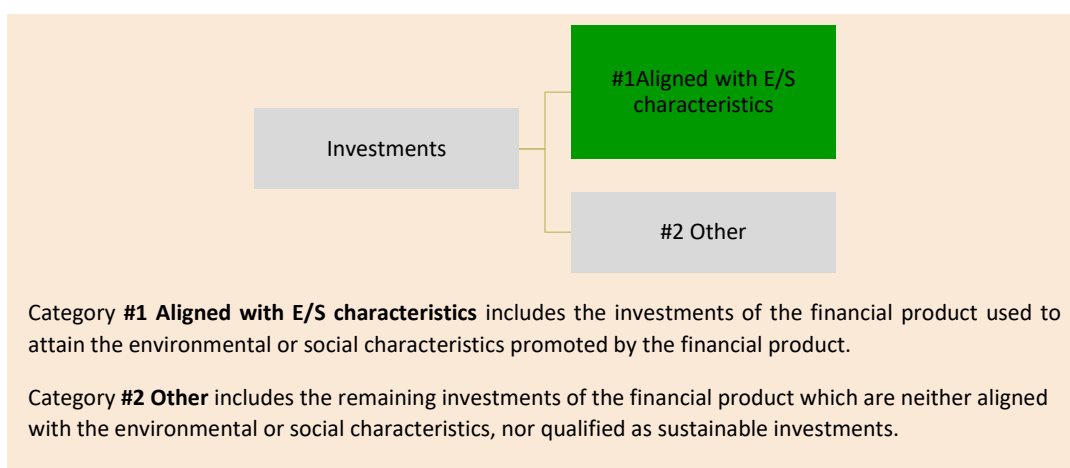
**Asset allocation** describes the share of investments in specific assets. Taxonomy-aligned activities are expressed as a share of:

- **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 remaining share of investments that are not included in investments to promote environmental or social characteristics or in the classification of sustainable investments (#2 Other) is limited to:

- cash, which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives that may be held for investment purposes in order to implement its investment policy and/or for risk hedging purposes, but not to promote environmental and/or social characteristics; and
- securities for which the relevant data is not available or, if available, does not meet the minimum criteria established by the binding elements.

With regard to minimum environmental and social guarantees, the Manager shall monitor all relevant aspects for each company receiving an investment, including violation of the OECD Guidelines for Multinational Enterprises and the UN Guidelines on Business and Human Rights, using data from third parties.



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

While the Sub-fund may use derivatives for hedging and investment purposes, derivatives are not used to promote environmental or social characteristics.



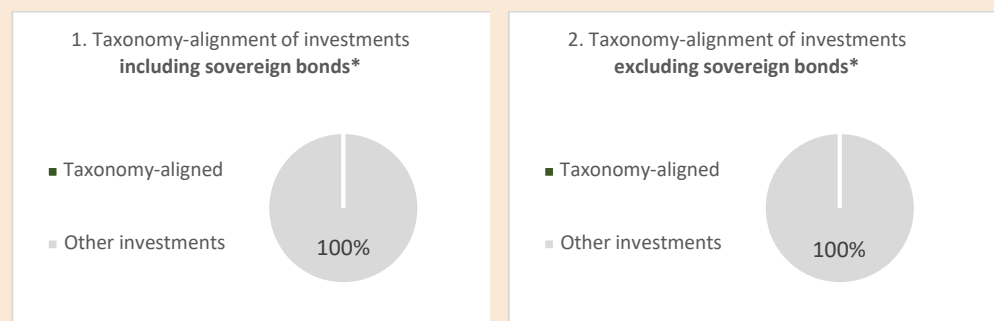
### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Not applicable.

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

**Transitional activities** are those for which low-carbon alternatives are not yet available and which, among other things, have greenhouse gas emission levels corresponding to the best achievable performance.

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?**

Not applicable.



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

Not applicable.



The symbol represents sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable energy activities under the EU taxonomy.



**What is the minimum share of socially sustainable investments?**

Not applicable.



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

The proportion of investments not aimed at promoting environmental or social characteristics, or in the classification of sustainable investments (#2 Other) is limited to:

- cash, which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives that may be held for investment purposes in order to implement its investment policy and/or for risk hedging purposes, but not to promote environmental and social characteristics; and



- securities for which the relevant data is not available or, if available, does not meet the minimum criteria established by the binding elements.

There are no minimum environmental or social safeguards on these investments.



**Benchmarks** are indices to measure whether the financial product attains the environmental or social characteristics that it promotes.

### **Is a specific index designated as a benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No benchmark has been designated to achieve the environmental or social characteristics promoted by the Sub-fund.

- ***How is the benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

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:**

- <https://www.azimutinvestments.com/sustainable>
- <https://www.azimutinvestments.com/policies-and-documents>
- <https://www.azimutinvestments.com/sustainable/websitedisclosures>