

3) iMGP – US SMALL AND MID COMPANY GROWTH

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

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.

Product name: iMGP - US SMALL AND MID COMPANY GROWTH
Legal entity identifier: 54930001QZSSY530QY50

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ____% <div> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy </div> <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ____%	<input type="checkbox"/> 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 <div> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective </div> <input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments



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

The environmental, social and governance (ESG) characteristics promoted by this Sub-fund consist of investing in companies that have a reduced or negligible ESG risk and a good ESG Quality Score while excluding certain companies and sectors because they are not compatible with the Sub-Manager’s view on sustainable development. No reference benchmark has been designated to attain the environmental and social characteristics promoted.

The environmental and/or social characteristics promoted by the Sub-fund are climate change initiatives, initiatives to improve environmental footprints and footprints and positive agendas of stakeholders that may be involved in, or impacted by, an investee company.

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

As part of a comprehensive assessment of all company risks and opportunities, the Sub-fund integrates relevant and material ESG indicators into the investment decision process.

The Sub-Manager analyses social indicators as the value the company creates for its stakeholders, such as its employees, customers, shareholders, and partners. It also observes how the working environment the company cultivates for its employees and the experience it offers its customers, often builds loyalty and retention, which can strengthen the brand.

The Sub-Manager analyses also the company’s environmental practices, such as improved energy, water efficiency or product packaging. These elements are considered essential to the company’s long-term sustainability.

Finally, The Sub-Manager supplements its internal research with the company’s ESG ratings and research from third-party ESG data providers.

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

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?

Not applicable as the Sub-fund does not make sustainable investments.

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 as the Sub-fund does not make sustainable investments.

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

Not applicable as the Sub-fund does not make sustainable investments.

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

Not applicable as the Sub-fund does not make sustainable investments.

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.

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, in line with Article 7 of the Sustainable Finance Disclosure Regulation, this fund considers the Principal Adverse Impacts (PAI) of its investment decisions.

While the ability to currently meaningfully assess these impacts may be limited by an absence or limited availability and quality of information; the Sub-Manager will continue to further develop these processes to gather, when available, information and data on PAI of their investments.

The present table summarizes the lists of the principal adverse impacts considered by this Sub-fund in its investment process (Annex I of the Commission delegated regulation supplementing Sustainable Finance Disclosure Regulation). More information on how the Sub-fund considers its principal adverse impacts may be found in the periodic reporting of the Sub-fund.

Adverse sustainability indicator	Metric	Impact year	Explanation and Actions taken, actions planned, and targets set for the next reference period
Carbon footprint	Data available at the end of 2022	2022	Principal adverse impacts are taken into account by this Sub-fund through the following measures: <ul style="list-style-type: none"> the exclusion policy implemented by the Sub-Manager limits the exposure to certain PAI on ESG aspects by excluding sectors that have a negative impact on sustainability (ex: exclusion of controversial weapons) the analysis of ESG score using PAI such as carbon footprint to measure the alignment of the portfolio with the ESG characteristics promoted by the Sub-Manager
Exposure to companies active in the fossil fuel sector	0%	2022	
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Data available at the end of 2022	2022	
Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Data available at the end of 2022	2022	



What investment strategy does this financial product follow?

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

While this Sub-fund promotes environmental characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any “sustainable investment” within the meaning of the SFDR or the Taxonomy Regulation. Accordingly, it should be noted that this Sub-fund does not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and its portfolio alignment with such Taxonomy Regulation is not calculated. Therefore, the “do not significantly harm” principle does not apply to any of the investments of this Sub-fund.

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 ESG analysis that the Sub-Manager will apply on the whole portfolio (excluding cash and derivatives) to achieve the Sub-fund’s objective is binding. This includes the assessment of various proprietary business matters which are indicators of companies serving well the environment, among others. The Sub-fund has also adopted an exclusion policy whereby certain investments are excluded (such as companies that produce controversial weapons or companies whose revenues derive to a certain extent from thermal coal).

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

The Sub-Manager does not currently invest directly in, based on the Sub-Manager’s assessment, companies whose revenues are made up of at least 25% of the following:

- (i) adult entertainment production,
- (ii) small arms,
- (iii) tobacco production,
- (iv) thermal coal.

In addition, the Sub-Manager will exclude investment in companies:

- identified as producing controversial weapons,
- that it believes do not follow good governance practices through the Sub-Manager’s analysis of several proprietary governance-related matters it considers within the investment process, as further outlined below.

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

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

The Sub-Manager assesses several business matters classified by it as material governance factors that it believes are important to assessing whether a company has good governance in its view, including but not limited to what it considers sound management structures, management of employee relations, management of remuneration of staff, and tax compliance.

The Sub-Manager uses a qualitative approach to assess prior to investment and monitoring over the life of an investment, the above-mentioned material governance factors to determine if an investee company follows good governance practices through using publicly available information identified and considered material by the Sub-Manager for such assessments. This publicly available information may consist of, for example, financial statements and reports filed by a company, investor events and meetings hosted by a company, industry information, and any other such information. In addition, as part of assessing an investee company with the above-mentioned material governance factors that are utilized by the Sub-Manager in determining if the investee company follows good governance practices, the Sub-Manager engages with companies it has invested in on behalf of the Sub-fund that provide access to it, to discuss and encourage progress in such factors that it feels the investee company can meaningfully improve. As part of this engagement process the Sub-Manager will also assess if the company continues to follow good governance practices.

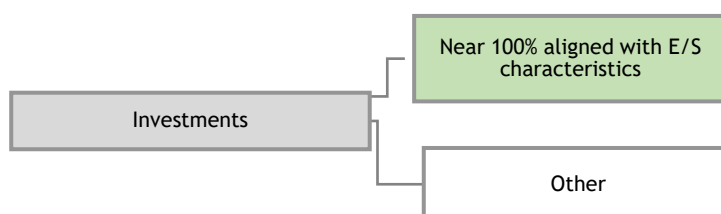


What is the asset allocation planned for this financial product?

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.



Aligned with E/S

characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product and are expected to be close to 100%.

“Other” includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics nor are qualified as sustainable investments. These include cash, money market instruments or similar instruments as well as derivatives.

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

The ESG performance of the Sub-fund does not take into consideration the derivatives to measure the attainment of environmental and social characteristics promoted.

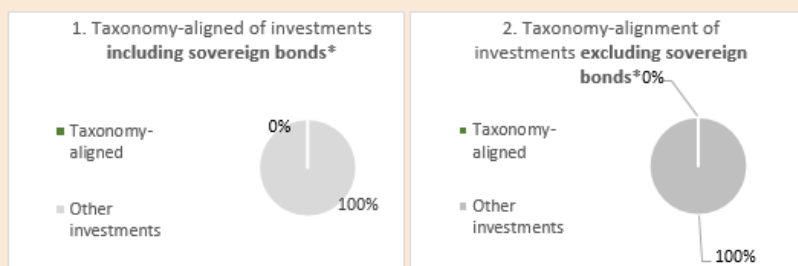


To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub-fund does not currently commit to invest in any sustainable investment within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

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.

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?**

As the Sub-fund does not commit to invest any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy Regulation is therefore also 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 promotes environmental and/or social characteristics but does not commit to making any sustainable investments. As a consequence, the Sub-fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

Not applicable as the sub-fund does not make sustainable investments.



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

“Other” includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics nor are qualified as sustainable investments. These include cash, money market instruments or similar instruments as well as derivatives. These investments do not follow minimum environmental and social safeguards.



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

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Not applicable: no designated benchmark for this Sub-fund to measure whether the financial product attains the environmental or social characteristics that it promotes.



Where can I find more product specific information online?

More product-specific information can be found on the website:
<https://www.imgp.com/en/sustainability>