

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: Helium Fund

Legal entity identifier: 213800ULSZKM6V3Y3I53

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.

Environmental and/or social characteristics

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?

Helium Fund (the "Sub-Fund") promotes both environmental characteristics and social characteristics.

In the environmental domain, the Sub-Fund promotes reductions in greenhouse gas (GHG) emissions, adherence to certain established international environmental norms (including the Paris Climate Agreement), a decline in the production and distribution of thermal coal and in energy produced from thermal coal, as well as in arctic drilling and oil sands exploitation.

In the social domain, the Sub-Fund promotes human rights, labour rights, consumer interests, and anti-corruption and tax compliance through its observance and support of established international norms such as the UN Global Compact and the OECD Guidelines for Multinational Enterprises. Beyond these, the Sub-Fund also promotes population health, welfare, and safety through reductions in the

production and distribution of tobacco products and the exclusion of companies producing or distributing controversial weapons.

No benchmark has currently been designated for the purpose of attaining these environmental and social characteristics.

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

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

The attainment of each of the environmental or social characteristics promoted is measured by reference to pertinent principal adverse impact (PAI) metrics (defined under Commission Delegated Regulation (EU) 2022/1288) where possible, or the number of investments in breach of the exclusion used to this end.

The sustainability indicators for each environmental and social characteristic promoted by the Sub-Fund are listed below:

- **Environmental protection, protection and promotion of human rights, labour rights, and consumer interests, promotion of anti-corruption and tax compliance:**
 - Number of investee companies that have been involved in violations breaches of the UN Global Compact (UNGC) principles and OECD Guidelines for Multinational Enterprises), if any, were verified, and unremedied.
 - Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises.
 - Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises.
- **Reduction in GHG emissions, and reductions in coal production, distribution, and use for energy purposes:**
 - Scope 1, 2, and 3 greenhouse gas (GHG) emissions, total GHG emissions, carbon footprint, GHG intensity of investee companies, share of investments in companies active in the fossil fuel sector.
 - Number of investee companies whose tonnage of thermal coal sold or produced, coal-based power production capacity, or share of revenue derived from the production or distribution of coal or coal-based energy exceeds the thresholds set out in the section “*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*” below. As demonstrated by the table in that section, all thresholds defined in our Coal Exit Policy are lowered biannually to attain zero in 2030.
- **Reduction in tobacco production and distribution:**
 - Number of investee companies whose share of revenue derived from the production or distribution of tobacco products exceeds 10% of their overall revenue.
- **Reduction in oil sands exploitation:**
 - Number of investee companies whose share of their revenue derived from the exploration, exploitation of oil sands or related services exceeds 5% of their overall revenue.
- **Reduction in arctic drilling:**
 - Number of investee companies whose share of revenue derived from arctic drilling exceeds 5% of their overall revenue.

- **Reduction in the production and sale of controversial weapons:**
 - Share of investments in investee companies involved in the manufacture or selling of controversial weapons.
 - Number of investee companies involved in the manufacture or selling of controversial weapons.
- **Promotion of the ratification of the Paris Climate Agreement (for sovereign bonds only):**
 - Number of sovereign bonds in which the Sub-Fund has invested whose issuer has not ratified the Paris Climate Agreement.

The sections “*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?*” and “*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*” below set out in greater detail the investment rules, and therefore the breaches, to which some of the indicators pertain.

- ***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.

- ***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.

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

The Sub-Fund considers certain indicators for adverse impacts, including principal adverse impact metrics. However, it does not intend to make any sustainable investments or to abide by the “do no significant harm” principle as defined under the EU Taxonomy Regulation.

The Management Company takes into account principal adverse impacts through a broad set of exclusions and restrictions, and an ambitious engagement and voting policy. The Management Company acknowledges that industry guidelines and best practices for ESG management are constantly evolving. Accordingly, our approach will be continuously monitored and reviewed on an annual basis.

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

N/A.

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.



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



Yes, the Sub-Fund's management considers the following principal adverse impacts ("PAIs") on sustainability factors:

- GHG emissions
- Carbon footprint
- GHG intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The management considers the Sub-Fund's PAI indicators to assess further portfolio construction processes. Annual information regarding the extent to which environmental or social characteristics are met will be annexed to the annual report for the year concerned.



No



What investment strategy does this financial product follow?

The Sub-Fund aims to achieve absolute returns by exploiting opportunities in the pricing of securities and financial derivative instruments.

The Management Company believes that there are attractive absolute returns to be generated in exploiting opportunities in the pricing of securities, financial derivative instruments and will seek to obtain absolute returns and to ensure that the performance of the Sub-Fund exhibits a low degree of correlation with that of the equity markets.

The Sub-Fund will not be limited to a single arbitrage strategy, but will use a multi-strategy approach. The strategies will be implemented based on essentially quantitative criteria; in this regard the technology employed by the Management Company is a key factor and the Sub-Fund will rely on a proprietary asset management platform able to evolve rapidly to identify and implement new kinds of strategies. Capital is allocated on a discretionary basis within the various strategies, depending on the assessment of their risk/reward made by the Management Company.

The Management Company will at all times seek to maintain a balanced investment portfolio for the Sub-Fund, avoiding excessive concentration in any single industry sector or geography. The Sub-Fund will mainly be invested in underlying instruments of issuers located in Europe and North America, but also potentially and more selectively in Asia and Americas.

The Sub-Fund's assets are predominantly allocated to investments used to promote environmental and social characteristics in accordance with the strategy described in the following sections.

● ***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?***

As set out below, the Sub-Fund's investment strategy to attain each of the environmental or social characteristics promoted consists of two binding pillars, namely, exclusions (A) and active ownership (B).

Pillar A – Exclusions

In summary, the Sub-Fund's exclusions apply to the following:

- i. Companies in breach of established international norms, including the UN Global Compact and the OECD Guidelines for Multinational Enterprises.
- ii. Companies whose involvement in coal or coal-based energy exceeds the thresholds set out by our Coal Exit Policy.
- iii. Other sectors:
 - tobacco,
 - arctic drilling,
 - oil sands.
- iv. Companies involved in controversial weapons: chemical and biological weapons, nuclear weapons outside the Non-Proliferation Treaty, and depleted uranium, in addition to the exclusion required by law of cluster munitions (Oslo Convention, 2008) and anti-personnel mines (Treaty of Ottawa, 1999).
- v. Internationally sanctioned entities pursuant to the lists issued by the OFAC, UN, and EU, as required by law.
- vi. Sovereign debt instruments issued by countries having not ratified the Paris Climate Agreement.

Unless otherwise stated, the Sub-Fund's exclusions only apply to long exposures. Those relating to controversial weapons, international sanctions, and non-ratification of the Paris Climate Agreement (iv, v, and vi, respectively) apply both to long and short exposures.

Please note that the Management Company may take a reasonable forward-looking perspective regarding exclusions relating to international norms breaches, coal and coal-based energy, tobacco, arctic drilling, and oil sands (exclusions i to iii, respectively) where sufficiently credible commitments to improve the relevant characteristic are communicated by the companies concerned or, if appropriate in the case of norms breaches, where satisfactory remediation measures are implemented.

Any inclusion and assessment of forward-looking considerations as part of the further analyses that may be undertaken by the Management Company will be duly documented. Although the Sub-Fund's exclusions initially come into effect automatically based on data received from our data provider, its set of excluded issuers may be adjusted if data is found to be erroneous or based on the above-mentioned further analyses if these demonstrate that certain exclusions are unwarranted.

Please refer to the following section for the thresholds pertaining to each exclusion, if any.

Pillar B – Active ownership

The Sub-Fund undertakes a variety of engagement activities with investee companies and corporate issuers to encourage the improvement of their ESG practices as well as to motivate

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

the adoption of a long-term ESG strategy. The Management Company's Active Ownership Policy comprises a voting policy, and both an individual and collective engagement policy.

Voting

The Management Company's voting policy takes as its frame of reference internationally recognized sustainability-related initiatives such as the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UN PRI), United Nations Global Compact, and International Labour Organization Conventions (ILO). Each of these initiatives promotes a fair, unified, and productive reporting and compliance environment that advances corporate ESG actions that present new opportunities and/or mitigate related financial and reputational risks.

On matters of corporate governance, executive compensation, and corporate structure, the Management Company's proxy voting guidelines are based on a commitment to create and preserve economic value and to advance principles of good corporate governance.

Collective Engagement

Through collaborative initiatives, SYQUANT Capital cooperates with other investors to leverage their collective say on the ESG practices of investee companies. Active cooperation among shareholders on ESG issues also lends them greater access and influence through privileged, result-oriented conversations with companies around selected ESG issues.

In particular, the Management Company subscribes to a collective engagement policy focused on violations of established international norms in the areas of:

- Human Rights
- Labour Rights
- Environment
- Corruption

Please refer to the Management Company's Active Ownership Policy available on Syquant Capital's website for further information.

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

The minimum rates of reduction of the Sub-Fund's investment scope in relation to the binding exclusions outlined previously are as follows:

- **Coal Exit Policy:** through the biennial reduction of absolute and relative maximum thresholds on the production and distribution of thermal coal and the coal-based power generation of potential investee companies, the Sub-Fund commits to a 100% reduction in companies involved in the thermal coal and coal-based energy sectors by 2030. The specific maximum thresholds will be applied as follows:

		2021	2023	2025	2027	2030
Production and distribution	Millions of tons	30	20	10	5	0
	% of total revenue	10%	8%	5%	3%	0%
Coal-based power generation	Capacity (GW)	10	8	5	3	0
	% of total revenue	40%	30%	20%	10%	0%

- **Exclusion of tobacco, arctic drilling, and oil sands:** Our sectoral exclusions of tobacco products, arctic drilling, and oil sands apply maximum thresholds on the share of revenue generated by potential investee companies through the production and distribution of

tobacco products, arctic drilling (incl. exploration and exploitation), and oil sands (incl. related services) respectively. These maximum thresholds are as follows:

	% of total revenue
Tobacco products (production and distribution)	10%
Arctic drilling (exploration or exploitation)	5%
Oil sands (exploration, production, or related services)	5%

- **Other exclusions:**

The other exclusions apply, as defined in the previous section, without regard to any activity-based thresholds.

	Minimum exclusion rate
Violations of established international norms	100%
Controversial weapons involvement	100%
International sanctions (OFAC, UN, EU)	100%
Non-ratification of the Paris Climate Agreement (sovereign debt only)	100%

As previously mentioned, exclusions relating to controversial weapons, sanctions, and non-ratification of the Paris Climate Agreement apply both to the short and long legs of the Sub-Fund's portfolio.

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

The Management Company's policy to assess the good governance of investee companies involves consideration of:

- the specific rating attributed to their governance practices by our ESG data provider,
- high-level breaches of established international norms relating to good governance, and in particular, the UN Global Compact and OECD Guidelines for Multinational Enterprises. Companies whose violation of an established international norm is verified will be automatically excluded from the long leg of the Sub-Fund's portfolio.

The Sub-Fund's governance assessment will also consider issuers' accountability, the protection of shareholders/bondholder's rights and long-term sustainable value creation.

What is the asset allocation planned for this financial product?

The Management Company will aim to use as much of the Sub-Fund's investments to meet the environmental or social characteristics promoted by the Sub-Fund in accordance with the binding elements of the investment strategy. The proportion of such investments will nonetheless vary due to the constraints imposed by the Sub-Fund's ancillary liquidity requirements and the application of its risk management strategy. A minimum proportion of 75% of the financial product's investments are used to meet the environmental or social characteristics promoted while up to 25% of the investments are not aligned with these characteristics (#2 Other).

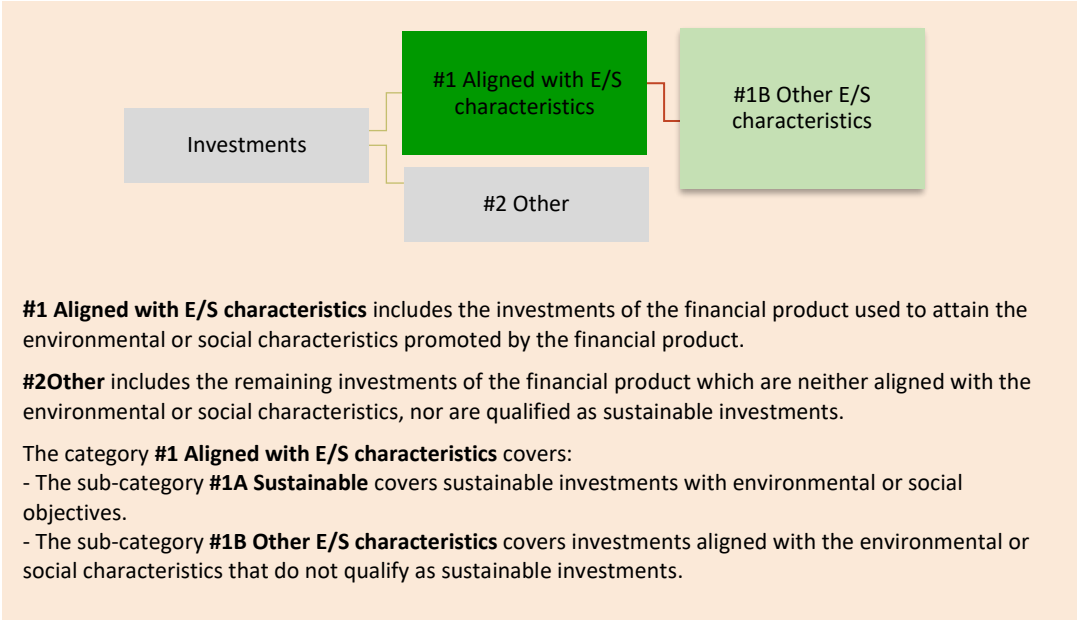
Good governance
practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



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

The Sub-Fund may use various financial derivative instruments to reduce risks or costs or to generate additional capital exposure or income to meet the investment objectives of the Sub-Fund and to implement its strategies, as further described in the “Financial Derivative Instruments” section of the “Risk Considerations” chapter of the prospectus.

The Sub-Fund will make a difference between, on one hand, derivatives that provides an exposure to an underlying asset, including the underlying’s ESG risk, and, on the other hand, derivatives that are used for hedging risks in the Sub-Fund, such as FX derivatives or interest rate swaps (IRS), which could be used to hedge currency or interest rate risks in the portfolio.



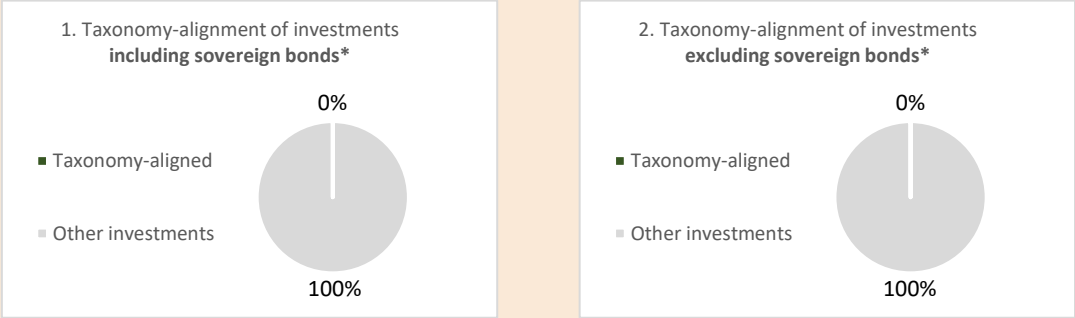
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A.

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?**

N/A.



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?

N/A.



What is the minimum share of socially sustainable investments?

N/A.



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

The “#2 Other” category primarily contains cash, which may be held as ancillary liquidity or for risk balancing purposes. “#2 Other” may also include securities for which relevant data is not available.

The Sub-Fund does not consider any minimum environmental or social safeguards on these remaining investments.



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?

N/A.



Where can I find more product specific information online?

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

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