Annexe IV - SFDR Disclosures

Sycomore Fund Sicav – Sycomore Europe Eco Solutions

Transparency of the promotion of environmental or social characteristics and of sustainable investments in periodic reports

The fund is a financial product as referred to article 9§2 *on sustainability-related disclosures in the financial services sector regulation* ("SFDR" regulation). As such, an overall sustainability-related impact of the financial product by means of relevant sustainability indicators is expected.

The fund has not designated a sustainable index as a reference benchmark for the assessment of its sustainable investment objective and therefore does not fall under article 9§1 of the SFDR regulation.

Did this financial product have a sustainable investment objective?	
x Yes	☐ No
x **It made sustainable investments with an environmental objective: 96%:**	☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of___% of sustainable investments:
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy x in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under EU Taxonomy. ☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under EU Taxonomy. ☐ With a social objective
☐ It **made sustainable investments with a social objective: none**	☐ It promoted E/S characteristics, but **did not make any sustainable investments**

To what extent was the sustainable investment objective of this financial product met?

As indicated in the prospectus, the fund aims to achieve a significant performance over a minimum investment horizon of five years, through a rigorous selection of stocks of companies whose business model, products, services, or production processes positively contribute to the energy and ecological transition challenges, through a thematic SRI strategy.

To support the sustainable investment objectives of the fund, the assessment of transition risk is mainly based on the NEC metric, the Net Environmental Contribution[1], and is completed with green differentiation and forward-looking information, such as alignment and trajectory elements, taxonomy-related information or eco-design and lifecycle approaches. The NEC is a holistic, science-based metric that enables investors to measure to what extent a given business model is aligned or misaligned with the ecological transition.
To be eligible to the investment universe of the fund, the NEC score has to be strictly positive on a scale from -100% to +100%.

In 2022, c. 96% of the portfolio's investments were sustainable investments with an environmental objective: associated issuers had a strictly positive NEC, and thus contributed positively to energy and ecological transition challenges.

The remaining 4% of the fund's assets under management were cash and currency hedges, and therefore reported here as "not sustainable".

[1] The NEC is a metric that measures the extent to which a company's business model is aligned with the ecological transition and the climate change mitigation objectives. It ranges from -100% for businesses that are highly damaging to natural capital, to +100% for companies with a strong positive net impact, offering clear solutions to environmental and climate-related challenges. The NEC covers five impact categories (issues: climate, waste, biodiversity, water, air quality) by group of activities (contributing areas: ecosystems, energy, mobility, construction, production). More details on the metric can be found on the NEC initiative's website: https://nec-initiative.org/

The information from this section can be summarized as follows:

Fund objective	Objective metric	Asset allocation as per SFDR art. 9
Positive contribution to the energy and ecological transition challenges	Net Environmental Contribution (NEC) > 0%	Sustainable investment with an environmental objective

- **How did the sustainability indicators perform?**

  The fund aims at outperforming its benchmark (MSCI Daily Net TR Europe Index) regarding:

  - The NEC: in 2022, the financial product had a weighted average NEC equal to +46%, while its benchmark had a weighted average NEC equal to -2%. This reflects the environmental objective of the fund, valuing companies contributing to the energy and ecological transition, having one or more activities related to energy, transportation and mobility, renovation and construction, circular economy and ecosystems.

  - Its exposure to green activities, defined as Greenfin Label activities type I and type II: in 2022, the financial product had a weighted average share of Greenfin type I and type II investments equal to 95% of its assets under management, versus 7% for its benchmark. This results from the same reasons as indicated in the previous point.

- **…and compared to previous periods?**

  In 2021, the fund:
  - Had a weighted average NEC equal to +47%.
  - Had a weighted average share of Greenfin Label activities type I and type II equal to +92%.

- **How did the sustainable investments not cause significant harm to any sustainable investment objective?**

  Two safeguards are implemented across all investments of the fund to ensure sustainable investments do not cause significant harm to any sustainable investment objective:
  - The SPICE methodology involves the analysis of over 90 criteria, structured around the five stakeholders (Society & Suppliers, People, Investors, Clients and the Environment). Investments causing significant harm to one or more sustainable investment objectives are meant to be excluded through:
    - A minimum threshold, set at 3/5 for each investment of the financial product;
    - Consideration of controversies associated with issuers, monitored daily based on various sources of external data as well as controversy analyses run by an external provider. All controversies impact the SPICE rating of the issuer. Severe controversies can lead to an exclusion from the financial product;
  - The exclusion policies[2] adds restrictions on activities that are regarded as causing significant harm to at least one sustainable investment objective.

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

      The SPICE methodology, through its 90 criteria, covers all environmental, social and governance issues targeted by the indicators for adverse impacts on sustainability factors listed within the Regulatory Technical Standards[3].

      The financial product invested exclusively in equities of listed companies. Out of the 46 adverse impact indicators applicable to companies and excluding one item dedicated to bond investments (14 principal adverse impact indicators listed in Table 1, as well as 32 additional adverse impact indicators listed in Table 2 and Table 3), 42 indicators (23 environmental indicators and 19 social indicators) are covered during

[2] The exclusion policies are available on Sycomore AM's website - https://en.sycomore-am.com/esg-research-material?categoryKey=policies and on French Environmental Ministry https://www.ecologie.gouv.fr/label-greenfin#scroll-nav__5
[3]https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1288&from=EN

SPICE analysis, and 4 indicators (1 environmental indicator and 3 social indicators) are targeted by Sycomore AM's exclusion policy.

More specifically, Sycomore AM's fundamental analysis model SPICE, is an integrated model, allowing to get a holistic view of companies of the investment universe. It was built taking into account OECD guidelines for Multinational Enterprises. It fully integrates ESG factors to capture how companies are managing adverse impacts as well as key sustainable opportunities.

Examples of matching between adverse impact indicators and SPICE items include *inter alia*:

Society & Suppliers (S): The S rating reflects the performance of the company with respect to its suppliers and civil society. Analysis relates to the societal contribution of products and services, corporate citizenship, and the outsourcing chain. Adverse sustainability indicators including lack of a supplier code of conduct, insufficient whistleblower protection, lack of a human rights policy, lack of due diligence, risks related to human beings trafficking, child labour or compulsory labour, cases of severe human rights issues, and risks related to anti-corruption and anti-bribery policies, are taken into account in that Society & Suppliers section.

People (P): The P rating focuses on a company's employees and its management of human capital. The assessment of the People pillar covers the integration of people-related issues, employees' fulfilment (Happy@Work environment), and measurement of employee engagement. Adverse sustainability indicators including unadjusted gender pay gap, board gender diversity, workplace accident prevention policies and health & safety indicators, employee's grievance mechanisms, discrimination, and CEO pay ratios are addressed in that People section.

Investors (I): The I rating focuses on the relation between companies and their shareholders. The rating is assigned based on an in-depth analysis of the company's shareholder and legal structure and of the interactions and power balance between different players: management, shareholders and their representatives, directors. Analysis targets the business model and governance. Among adverse sustainability indicators, lack of diversity at board level and excessive CEO pay-ratio are also addressed in that section.

Clients (C): The C rating focuses on the company's clients as stakeholders, analyzing the offer made to clients as well as customer relationship.

Environment (E): The E rating assesses how the company stands with regards to natural capital. It accounts for management of environmental issues as well as positive or negative externalities of the company's business model. The operations environmental footprint subsection encompasses adverse sustainability impact indicators including greenhouse gas emission indicators, energy consumption, air pollution indicators, water, waste and material emissions, as well as biodiversity indicators. Sustainability impact indicators including carbon reduction initiatives and fossil fuel activities are addressed by the Transition Risk subsection of that E section.

Exclusion policy: finally, Sycomore AM's exclusion policy targets adverse sustainability impact indicators including controversial weapons, exposure to fossil fuel sector, chemical pesticide production, and more broadly was drafted to target companies in breach of the UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Once the analysis – SPICE analysis including review of controversies, exclusion policy compliance – is performed, it impacts investment decisions in the following ways:

- As indicated in the previous question, it provides a safeguard against significant harm to any sustainable investment objective, by excluding companies not meeting minimum safeguard requirements;
- It also impacts the financial investment case in two ways: 1. assumptions related to the company's prospects (growth and profitability forecasts, liabilities, M&A, etc.) can be fed by certain SPICE outputs as relevant, and 2. some core assumptions of valuation models are systematically linked to SPICE outputs.

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

  The development of Sycomore AM's analysis framework "SPICE" as well as the exclusion policy have been inspired by the OECD's Guiding Principles for multinational companies, the United Nations' Global

Compact, the International Labour Organization's international standards and the UN Guiding Principles on Business and Human Rights. To assess the fundamental value of a company, analysts systematically examine how a firm interacts with its stakeholders. This fundamental analysis is designed to understand strategic challenges, business models, management quality and degree of involvement, and the risks and opportunities faced by the company. Sycomore AM has also defined its Human Rights Policy[4] in compliance with the UN Guiding Principles on Business and Human Rights.
Despite the above-described due diligence set to detect potential breaches of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, actual compliance of the analyzed issuers can never be guaranteed.

How did this financial product consider principal adverse impacts on sustainability factors?

As indicated in the previous sub-section, principal adverse impacts, as well as all other adverse sustainability impact indicators, are considered through SPICE analysis and outputs, complemented by Sycomore AM's exclusion policy.

Among 14 principal adverse sustainability impact indicators, 9 are environmental indicators addressed within the E section of SPICE analysis, 2 are social indicators addressed within the P section of SPICE analysis, and 3 are targeted by the company's exclusion policy.

What were the top investments of this financial product?

Largest Investments	Sector	% net assets	Country
Schneider Electric SE	Industrials	3.7%	France
Veolia Environnement SA	Utilities	3.3%	France
Prysmian S.p.A.	Industrials	2.6%	Italy
Nexans SA	Industrials	2.5%	France
Alfen NV	Industrials	2.5%	Netherlands
Solaria Energia y Medio Ambiente, S.A.	Utilities	2.4%	Spain
SPIE SA	Industrials	2.4%	France
SIG Group AG	Materials	2.4%	Switzerland
Befesa SA	Industrials	2.3%	Germany
Corporacion Acciona Energias Renovables SA	Utilities	2.3%	Spain
Rexel SA	Industrials	2.2%	France
Voltalia SA	Utilities	2.2%	France
Infineon Technologies AG	Information Technology	2.2%	Germany
ERG S.p.A.	Utilities	2.1%	Italy
Arcadis NV	Industrials	2.1%	Netherlands

What was the proportion of sustainability-related investments?

- **What was the asset allocation?**

<table>
<tr><td rowspan="4">Investments (I)</td><td rowspan="4">100% of I</td><td rowspan="3">Sustainable (S)</td><td rowspan="3">96% of I</td><td rowspan="2">Environmental</td><td rowspan="2">100% of S
96% of I</td><td>Taxonomy-aligned</td><td>0% *</td></tr>
<tr><td>Other</td><td>100% of S
96% of I *</td></tr>
<tr><td>Social</td><td>0% of S
0% of I</td><td></td><td></td></tr>
<tr><td>Not sustainable (NS)</td><td>4% of I</td><td></td><td></td><td></td><td></td></tr>
</table>

* At the date of this report, available information does not allow to quantify the share of taxonomy-aligned investments among sustainable investments with an environmental objective.

[4] Sycomore AM's human rights policy is available at: https://en.sycomore-am.com/download/655023262

Nonetheless, an indicator for taxonomy-eligible investments of the financial product during the period is presented below.

Share of taxonomy-eligible investments The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-eligible economic activities relative to the value of total assets covered by the indicator[5]	
Turnover-based (%)	79%

Coverage (of the indicator Share of taxonomy-eligible investments) The percentage of assets covered by the indicator relative to total investments [6].	
Coverage ratio (%)	98%

- **In which economic sectors were the investments made?**

Sector distribution reflects the investment thesis and constraints of the fund.
In 2022, the sector breakdown was as follows, based on GICS 1 classification:

Sector	%
Industrials	52.2%
Utilities	22.9%
Materials	14.5%
Consumer Discretionary	4.7%
Information Technology	2.3%
Energy	1.9%
Financials	1.5%

- **To what extent were sustainable investments with an environmental objective aligned/not aligned with the EU Taxonomy?**

As indicated in the previous section, information available at the date of this report only allows to report taxonomy-eligible investment indicators.

- **Among sustainable investments with an environmental objective aligned with the EU Taxonomy, what was the share of investments made in transitional and enabling activities ; did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy ; how did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**
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As indicated in the previous section, information available at the date of this report only allows to report taxonomy-eligible investment indicators.

- **What was the share of sustainable investments with a social objective?**

As indicated previously, all sustainable investments in 2022 were made with an environmental objective.

- **What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?**

4% was cash for liquidity purposes and currency hedges, therefore reported here as "not sustainable".

- **What actions have been taken to attain the sustainable investment objective during the reference period?**

During the lifetime of an investment made by the fund:

  - On an *ex ante* basis (prior to investment into a company): investments are made under condition of meeting the criteria set by the fund regarding the energy and ecological transition challenges. Identifying whether the investment allows to attain the environmental objective is a prerequisite of the analysis.

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[5] Eligibility was assessed based on the NACE code of the ultimate parent of the undertakings
[6] Investments relate to investments in companies; therefore, investments not covered reported under the coverage divisor include undertakings whose ultimate parent is out of SFDR reporting scope, that is does not reside in the EU or with < 500 employees. Other assets not covered and *not* included in the coverage divisor are :investments in central governments, central banks and supranational issuers; investments in derivatives, cash and cash equivalents, indirect investments (UCITS)."

- On an ongoing and *ex post* basis (during and after investment holding period):
    - During the investment lifetime, analyses outputs can vary alongside events related to the underlying's development. Any event that would make the investment no longer eligible to the fund requirements regarding the environmental objective, or that would be subject to the exclusion policy, would trigger portfolio movements according to our internal procedures.
    - Engagement and exercising voting rights during the shareholding period also adds sustainability added value. The engagement strategy of the fund involves:
        - Engaging in discussions with companies held in our portfolios to fully grasp their ESG challenges;
        - Encouraging companies to publicly disclose their ESG strategies, policies and performance;
        - Calling upon companies to be transparent and instigate adequate and sustainable corrective measures following a controversy;
        - Getting involved in collective engagement initiatives on a case-by-case basis;
        - Asking questions, refusing to approve some resolutions or supporting external resolutions by exercising our voting rights.