

Annex 4 – Pre-Contractual Disclosures under Article 8 of SFDR

Product name: Man Funds plc – Man GLG Pan-European Equity Growth (the “Portfolio”)

Legal Entity Identifier (LEI): 549300CYSOR0YAE33X30

Environmental and/or social characteristics

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**. For the time being, it does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input checked="" type="radio"/> Yes	<input checked="" type="radio"/> <input type="radio"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ____%	<input checked="" 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 20% of sustainable investments
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective 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	<input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ____%	<input checked="" type="checkbox"/> with a social objective
	<input 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 characteristics promoted by the Portfolio are:

- the reduction of greenhouse gas (“**GHG**”) emissions; and
- the circular economy.

The social characteristics promoted by the Portfolio are:

- responsible labour relations; and
- investing in human health and capital.

No reference benchmark has been designated for the purposes of attaining the environmental or social characteristics promoted by the Portfolio.

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

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

The attainment of the environmental or social characteristics promoted by the Portfolio will be measured using the sustainability indicators specified below. The indicators are those prescribed by the UN Sustainable Development Goals (“**SDGs**”)¹ (*further information on the SDGs is mentioned below*) and the principal adverse impact (“**PAI**”) regime (*further information on PAI is mentioned below*):

CHARACTERISTIC	SUSTAINABILITY INDICATOR
ENVIRONMENTAL	
The reduction of GHG emissions	<ul style="list-style-type: none"> Climate action (SDG 13) GHG intensity of investee companies (weighted average carbon intensity-WACI) (PAI 3)
The circular economy	<ul style="list-style-type: none"> Industry, innovation and infrastructure (SDG 9) Responsible consumption and production (SDG 12)
SOCIAL	
Responsible labour relations	<ul style="list-style-type: none"> Decent work and economic growth (SDG 8)
Investing in human health and capital	<ul style="list-style-type: none"> Gender equality (SDG 5) Decent work and economic growth (SDG 8)

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 objectives of the sustainable investments that the Portfolio partially intends to make are to contribute to the attainment of the SDGs.

The Investment Manager uses alignment with the SDGs as its proxy for measuring contribution to an environmental or social objective.

The Investment Manager has implemented a proprietary process (the “**SDG Framework**”) to measure the extent of an issuer’s alignment to the SDGs (and, by extension, contribution to environmental or social objectives). The SDG Framework combines data from three external data providers in order to measure the extent of an issuer’s alignment to the SDGs, and produces an alignment score which may show positive alignment to one or more SDGs for a given investment.

The output of this process is a list of issuers, to be used by the Investment Manager, which have been formally identified as aligned with one or more environmental or social objectives based on the SDG Framework. Where the Portfolio invests in any of these issuers, those issuers will accordingly be treated as “contributing to” the objective of contributing to attaining the relevant SDG(s) with which the relevant investment is deemed aligned through its positive score.

¹ There are 17 SDGs: (1) no poverty, (2) zero hunger, (3) good health and well-being, (4) quality education, (5) gender equality, (6) clean water and sanitation, (7) affordable and clean energy, (8) decent work and economic growth, (9) industry, innovation and infrastructure, (10) reduced inequalities, (11) sustainable cities and communities, (12) responsible consumption and production, (13) climate action, (14) life below water, (15) life on land, (16) peace, justice and strong institutions, and (17) partnerships for the goals.

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?

One element of the definition of a “sustainable investment” is that the investment must do no significant harm (“**DNSH**”) to environmental or social objectives (the “**DNSH test**”). The Investment Manager has integrated the DNSH test into its investment due diligence process.

The Investment Manager assesses the DNSH test by reference to the PAI indicators. Please see below under “*Does this financial product consider principal adverse impacts on sustainability factors?*” for more information on how the Investment Manager considers the PAI of its investment decisions on sustainability factors.

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

The Investment Manager maintains a list of mandatory and additional PAI indicators which it considers as part of the investment due diligence process (please see below under “*Does this financial product consider principal adverse impacts on sustainability factors?*”). In other words, there is a list of sustainability indicators against which the Investment Manager obtains and reviews data on the adverse impact caused by investments.

For DNSH purposes, the Investment Manager sets its own subjective threshold of what it considers to be significant harm. This will typically be judged on a relative basis to the industry benchmark for the relevant issuer’s industry. If a particular potential investment is assessed by the Investment Manager to do significant harm, then it will be excluded from being treated as a “sustainable investment”.

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

As part of its investment due diligence, the Investment Manager will consider, when investing in corporates at issuer level, if there is any violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Following this assessment, any company in violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights would be considered to be doing significant harm and therefore would be excluded from being a sustainable investment.

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.

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 Portfolio pursues a reduction of negative externalities caused by the underlying investments and in that context considers the PAI of its investment decisions on sustainability factors by evaluating such decisions against the following PAI indicators: (i) all of the mandatory indicators as specified in Table 1 of Annex I of the SFDR Regulatory Technical Standards (Commission Delegated Regulation (EU) 2022/1288) (the “RTS”), and (ii) certain relevant indicators from Table 2 and Table 3 of Annex 1 of the RTS.

Sustainability indicators

The Investment Manager considers the following indicators. All indicators apply to investments in corporates only, other than indicators 15 and 16 from Table 1, which apply to investments in sovereigns:

Mandatory (from Table 1 of Annex I of the RTS)	
1.	GHG emissions
2.	Carbon footprint
3.	GHG intensity of investee companies
4.	Exposure to companies active in the fossil fuel sector
5.	Share of non-renewable energy consumption and production
6.	Energy consumption intensity per high impact climate sector
7.	Activities negatively affecting biodiversity-sensitive areas
8.	Emissions to water
9.	Hazardous waste and radioactive waste ratio
10.	Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises
11.	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12.	Unadjusted gender pay gap
13.	Board gender diversity
14.	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
15.	GHG intensity
16.	Investee countries subject to social violations
Additional (from Table 2 of Annex I of the RTS)	
4.	Investments in companies without carbon emission reduction initiatives
6.	Water usage and recycling
7.	Investments in companies without water management policies
15.	Deforestation
Additional (from Table 3 of Annex I of the RTS)	
6.	Insufficient whistleblower protection
9.	Lack of a human rights policy
15.	Lack of anti-corruption and anti-bribery policies
16.	Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery

How the Investment Manager considers adverse harm

The Investment Manager conducts investment due diligence on every investment, including a quantitative assessment of the impact of the investment against the above indicators, to assess any adverse harm identified by those indicators. For example, if a metric produces a numerical output for a given investment, the Investment Manager considers that the investment causes adverse impact if the investment is in the bottom decile relative to the industry sector of the issuer. If a metric produces a binary output for a given investment the Investment Manager considers that the investment causes adverse impact if the investment falls onto the harmful side of the binary output.

Following the quantitative assessment, the Investment Manager will decide what action to take, with a view to limiting or reducing the identified adverse impact. Such action may include (subject at all times to the obligation of the Investment Manager to act in the best interests of the Portfolio and its investors in accordance with the Portfolio’s investment objectives and policy):

- deciding to not make the investment;

- limiting the position size of the investment; or
- making the investment with an intention to engage with the management of the issuer to improve their business from a sustainability perspective.

The impact of the Portfolio's investment against the above indicators will continue to be monitored on a quarterly basis.

Where will the Investment Manager report further information?

Further information on PAI on sustainability factors will be set out in the Portfolio's annual report.

☐ No



What investment strategy does this financial product follow?

The Portfolio is a concentrated long-only fund which invests in European companies across all market capitalisations. In that regard, the Investment Manager typically forms a portfolio of 25-35 stocks selected from a universe of approximately 2,500 stocks. The process starts with a bottom-up approach (evaluating each individual company rather than looking at movements in prices within a particular market or market segment) leading to stocks that the Investment Manager believes demonstrate consistent growth. A company demonstrates consistent growth if it shows good cash flows (by way of income earned or cash generated in the course of its operations) and projected earnings (for example, where the return on revenue generated is likely to exceed production and operating costs), which the Investment Manager feels provide the best chance of sustainable growth in the medium to long-term.

The Investment Manager also favours companies where products and/or processes demonstrate sustainable behaviours. Behaviours and policies (which may be updated from time to time) which are deemed sustainable include the presence of a purpose-led culture, balancing present and future earnings, respectful conduct to all stakeholders and mindfulness of the planet's finite resources. The Investment Manager will generally favour companies where material environmental, social and governance ("ESG") behaviours lead to long-term competitive leadership and growth potential. The Investment Manager looks to engage with the companies it invests in, ie working collaboratively with corporate management teams to favour ESG behaviours and encourage sustainable changes within these companies.

While the SDG Framework detailed above under "*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?*" is used to determine those investments which are sustainable investments and those which are aligned with environmental and/or social characteristics, as disclosed in the Supplement, the Investment Manager's analysis integrates stock specific ESG considerations material to the long-term competitive leadership and growth potential of the stock. Internal ESG scoring methodology and thresholds pre-determined by the Investment Manager in its sole discretion are applied in assessing investments. The Investment Manager's review of target issuers may draw upon publicly available data and appropriate non-public sources of information.

This additional ESG strategy does not form part of the binding commitments and is not used to determine the minimum levels of sustainable investments and investments aligned with environmental and/or social characteristics but does form part of the overall investment process.

Further information on the investment approach of the Portfolio is set out in the main body of the Supplement.

● *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?*

(1) Exclusion List

The Investment Manager applies a proprietary exclusion list of controversial stocks or industries which may be related to arms and munitions, nuclear weapons, tobacco and coal-oriented activities. Further information on the exclusion policy can be obtained from the Investment Manager on request.

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

(2) Commitment to invest in Sustainable Investments

The Portfolio commits to have a minimum proportion of 20% of sustainable investments. This is a % of the Portfolio's Net Asset Value (NAV). To identify sustainable investments, the Investment Manager uses the SDG Framework, as described above at the section "*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?*".

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

Not applicable.

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

The good governance practices of investee companies are assessed prior to making an investment and periodically thereafter in accordance with minimum standards. Such standards include, but are not limited to, sound management structures, employee relations, remuneration of staff and tax compliance.

Good governance is defined as the set of rules, practices, and processes used to manage an enterprise to improve economic resilience and transparency for shareholders, regulators, and other stakeholders.

Third party data is used as part of the good governance test. This provides information on governance matters at investee and target investee companies. Depending on how a company scores in accordance with the good governance policy, this may result in confirming: (i) a company follows good governance; or (ii) further review is required which may include engagement with the relevant investee company. Any engagement may result in the Investment Manager concluding to either invest/remain invested, or alternatively not to invest/divest where the Investment Manager determines that the company does not follow good governance.

What is the asset allocation planned for this financial product?

As at the date of the Prospectus, the following allocations apply:

#1 Aligned with E/S characteristics: The Investment Manager intends to invest a minimum of **20%** of the Portfolio's NAV in investments which attain the environmental and social characteristics promoted by the Portfolio.

#1A Sustainable: The Investment Manager commits to invest a minimum of **20%** of the Portfolio's NAV in sustainable investments.

#2 Other: The remaining **80%** of the Portfolio's NAV will be in investments which seek to achieve the broader objectives of the Portfolio, including those which may not match the Portfolio's ESG criteria in its entirety but have the adequate minimum safeguards, achieved through eg exclusions at the outset, the integration of sustainability risk management and the application of good governance policies.

#1A Sustainable - Other Environmental and Social: The Investment Manager commits to invest a minimum of **20%** of the Portfolio's NAV in sustainable investments. In respect of the further sub-categories of sustainable investment indicated in the asset allocation chart below:

- The Investment Manager does not commit that the Portfolio's sustainable investments will be aligned to any minimum extent with the EU Taxonomy, and so is disclosing a 0% commitment to Taxonomy-aligned investments.
- In light of the Investment Manager's SDG Framework (as described above, in the section of this Annex titled "*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?*"), while the Portfolio commits to investing a minimum in sustainable investments with both environmental and social objectives, as

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.

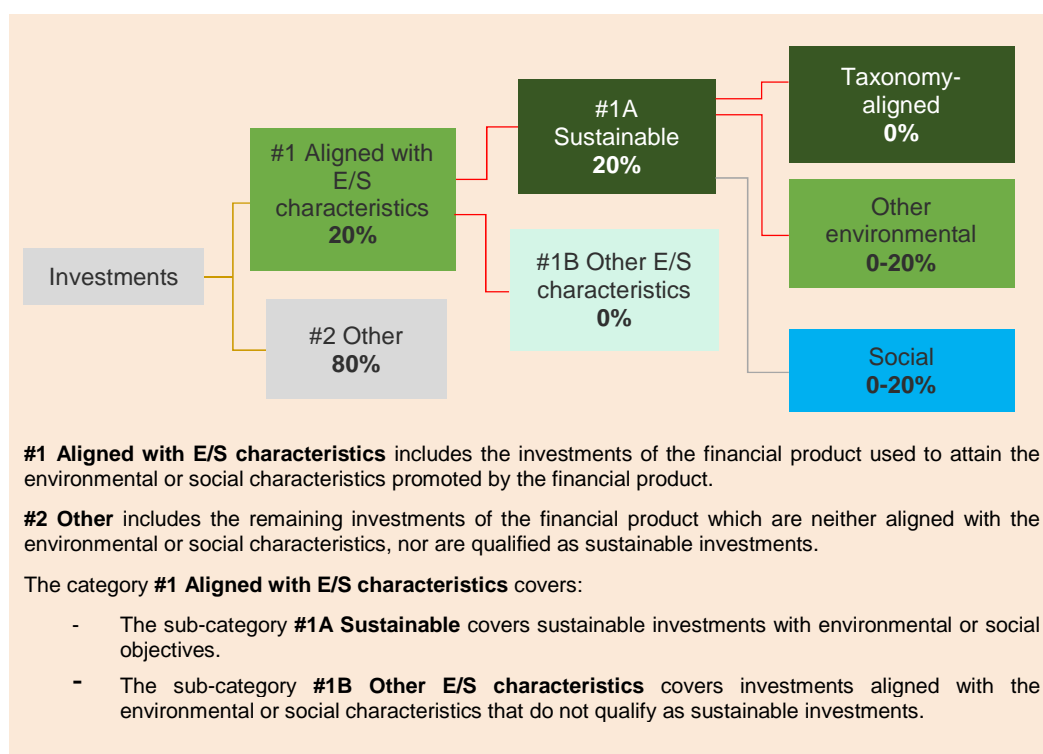
set out above, this minimum can be achieved through any mix of such environmental and/or social sustainable investments.

- As such, there is no prioritisation of one category over the other. Investments in these assets is based on materiality which is unique to each individual investment. The investment process accommodates the combination of environmental and social objectives by allowing the Investment Manager the flexibility to allocate between these categories, based on availability and attractiveness of investment opportunities.
- However, the Investment Manager believes that it would be potentially misleading to disclose “0%” commitment to the sub-categories of other environmentally sustainable investments, or socially sustainable investments, where the Investment Manager has committed to invest a minimum of **20%** of the Portfolio’s NAV in sustainable investments.
- Instead, the Investment Manager has determined that it would be clearer to disclose a commitment to make investments in the range of **0% to 20%**, for those two sub-categories.

Investors should note: there may be times when the Portfolio is not in a position to maintain a minimum commitment due to extenuating circumstances or reasons beyond the control of the Investment Manager. In such circumstances, the Investment Manager will take all reasonable steps as soon as reasonably possible to rectify any deviation taking into account the best interests of Shareholders.

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?**

Not applicable.



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

The Portfolio does not commit that its sustainable investments with an environmental objective will be aligned to any minimum extent with the EU Taxonomy.

As such, the Investment Manager discloses for the purposes of the SFDR and the EU Taxonomy that, at the date of this Prospectus, the Portfolio has a 0% minimum alignment with the EU Taxonomy.

The Investment Manager does not currently use the EU Taxonomy as a mandatory part of its investment process, and so wishes to retain the flexibility to invest in sustainable investments which are suitable for the Portfolio, without being tied to a minimum commitment to make Taxonomy-aligned investments. The Investment Manager considers that this approach is consistent with its duty to act in the best interests of Shareholders in the Portfolio.

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 Portfolio does not commit to make investments which are aligned with the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is 0%.



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

0-20% (please see the asset allocation section above for further information).



What is the minimum share of socially sustainable investments?

0-20% (please see the asset allocation section above for further information).



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economy activities under the EU Taxonomy.



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

The purpose of any investments made by the Portfolio that may be classified as “#2 Other” is mainly in companies that may not match the Portfolio’s ESG criteria in its entirety but have the adequate minimum safeguards, achieved through eg exclusions at the outset, the integration of sustainability risk management and the application of good governance policies.

Additionally, there could be investments for the purposes of efficient portfolio management, liquidity management or hedging purposes and these will not be subject to minimum environmental or social safeguards. The Portfolio may also hold cash and cash equivalents which will not be subject to minimum environmental or 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?

No.

- *How is the reference 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.man.com/man-glg-pan-european-equity-growth-sustainability>

(please note that the Portfolio website will be updated accordingly as of 1 January 2023 to reflect SFDR regulatory requirements).

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