

# Sustainability related disclosures pursuant to Article 10 of Regulation (EU) 2019/2088 in conjunction with Article 24 of Delegated Regulation (EU) 2022/1288

The subject of this document is mandatory information on the environmental and/or social characteristics of this fund. It is not promotional material. This information is required by law in order to transparently explain the environmental and/or social characteristics promoted by the fund.

# **Univest Global Sustainable Credit Bonds Sub-Fund**

ISIN: LU0871232277, LU1474185664, LU2487003787

The (Sub-)Fund is managed by Universal-Investment-Luxembourg S.A. (the "management company").

# a) "Summary"

## No sustainable investment objective

Sustainable investments are not the objective of this (Sub-)Fund.

#### Environmental or social characteristics of the financial product

This (Sub-)Fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation.

#### The Sub- Fund has the following E/S characteristics:

ESG Objective of the Sub- Fund is to invest more in companies who are well prepared for the climate transition (based on company research) and to consider S and G factors. In addition, the Sub- Fund fund excludes companies on the basis of controversial behaviour and controversial products (controversial weapons, conduct and coal).

In order to do so, the Sub-Fund strives for economic results, while at the same time taking into account the following environmental, social and governance characteristics:

- Climate, including a 30% reduction in carbon intensity of the portfolio to 31 December 2024 from a 2019 base value of 230.8 tons CO2e / \$M revenue and demonstrate increasing alignment of the portfolio's holdings and strategy with a trajectory consistent with the aims of the Paris Climate Agreement
- Governance, which may include, but not limited to, board/management quality, structure and integrity, remuneration, reporting and stakeholder governance;
- Social, which may include, but not limited to, diversity, discrimination, freedom of association, human rights and gender pay equality; Investments may be made in 'sustainable bonds', including, but not limited to social and green bonds, as defined by the Bloomberg classification, the Investment Manager will take account of ESG factors in the selection, retention and realisation of investments. The Investment Manager will be required to identify and report on both the risks and opportunities that pertain to each underlying company that is held.

## Investment strategy

The manager should integrate ESG risks in the investment process. Also the Investment Manager to be an active owner, implementing a programme of engagement aligned with the Sub Funds's objectives and requirements

- communicate engagement priorities to the Sub FUnd.
- participate in, and promote, stewardship codes in countries relevant to the investment portfolio.
- allocate resources to public policy engagement on responsible investment-related issues.
- engage with carbon intensive companies to ensure their carbon reduction targets are meaningful and aligned with the 2015 Paris Agreement under the United Nations Framework Convention on Climate Change.
- engage with investee companies/ entities to address ESG risks and trends impacting or with the potential to impact portfolio investments.

## **Proportion of investments**

The asset allocation of the (Sub-)Fund and the extent to which the (Sub-)Fund has direct or indirect exposures in investee entities can be found in the investment limits and guidelines.

Cash is for liquidity management and hedging instruments are to manage currency exposure of the Sub-Fund. For other investments that are not part of the (Sub-)Fund's sustainability strategy, there are no binding criteria to consider minimum environmental and/or social safeguards. This is either due to the nature of the assets, where at the time of the preparation of the (Sub-)Fund's documents there are no legal requirements or standard market procedures on how to consider minimum environmental and/or social safeguards for such assets or investments are specifically excluded from the sustainability strategy, which are then also not subject to the consideration of minimum environmental and/or social safeguards.

# Monitoring of environmental or social characteristics

Initially, the environmental and/or social features and the sustainability indicators promoted by the (Sub-)Fund are checked in a qualitative manner by the ESG Office of the management company/the AIFM. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by Investment Controlling of the management company/the AIFM and additionally by the portfolio manager for outsourced portfolio management mandates. Internal controls are carried out by portfolio management and risk controlling. External controls are carried out regularly by auditors in examining the annual reports and at state level by the national supervisory authority.

#### Methodologies for environmental or social characteristics

The E/S characteristics and the E/S indicators are monitored by the investment managers on a regular basis as part of the investment process and by applying restrictions on the exclusion list, regularly measuring restrictions and controls. In this way the Sub-Fund uses the E/S indicators to measure if the promoted E/S characteristics are achieved. Adherence to the exclusion list is monitored by the risk department of the Management Company. In addition, the appointed Investment Managers will take account of ESG factors in selecting, retention and realisation of investments as well as taking into account if the companies in which is invested follow good governance practises. An external specialist will be appointed to provide active ownership services to the Sub- Fund although the Investment Managers will be expected to engage with companies held in their portfolios as well. The Investment Managers engagement will be monitored to ensure they support the objectives of their mandate.



#### Data sources and processing

Data from ISS, Sustainalytics, Trucost, CDP, Hermes is used to attain each of the environmental and/or social characteristics promoted by the (Sub-)Fund.

#### Limitations to methodologies and data

ESG data like ESG scores depend on the methodology used by the provider MSCI or Sustainalytics. The qualification of a green bond depends on the assement made by Bloomberg. And WACI is compiled by ISS applying their internal measurement process.

#### Due diligence

Through the establishment and application of written policies and procedures effective arrangements are in place to ensure that investment decisions made on behalf of the (Sub-)Fund are consistent with its objectives, investment strategy and, where applicable, risk limits.

#### **Engagement policies**

The engagement policy of the Management Company/the AIFM is exercised in the form of voting.

#### Designated reference benchmark

This (Sub-)Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the (Sub-)Fund.

## b) "No sustainable investment objective"

This financial product promotes environmental and/or social characteristics, but does not have sustainable investment as its objective.

## c) "Environmental or social characteristics of the financial product"

This (Sub-)Fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation.

The Sub- Fund has the following E/S characteristics:

ESG Objective of the Sub-Fund is to invest more in companies who are well prepared for the climate transition (based on company research) and to consider S and G factors. In addition, the Sub-Fund fund excludes companies on the basis of controversial behaviour and controversial products (controversial weapons, conduct and coal).

In order to do so, the Sub-Fund strives for economic results, while at the same time taking into account the following environmental, social and governance characteristics:

- Climate, including a 30% reduction in carbon intensity of the portfolio to 31 December 2024 from a 2019 base value of 230.8 tons CO2e / \$M revenue and demonstrate increasing alignment of the portfolio's holdings and strategy with a trajectory consistent with the aims of the Paris Climate Agreement
- Governance, which may include, but not limited to, board/management quality, structure and integrity, remuneration, reporting and stakeholder governance;
- Social, which may include, but not limited to, diversity, discrimination, freedom of association, human rights and gender pay equality;

Investments may be made in 'sustainable bonds', including, but not limited to social and green bonds, as defined by the Bloomberg classification, the Investment Manager will take account of ESG factors in the selection, retention and realisation of investments. The Investment Manager will be required to identify and report on both the risks and opportunities that pertain to each underlying company that is held.

# d) "Investment strategy"

The manager should integrate ESG risks in the investment process. Also the Investment Manager to be an active owner, implementing a programme of engagement aligned with the Sub Funds's objectives and requirements

- communicate engagement priorities to the Sub FUnd.
- participate in, and promote, stewardship codes in countries relevant to the investment portfolio.
- allocate resources to public policy engagement on responsible investment-related issues.
- engage with carbon intensive companies to ensure their carbon reduction targets are meaningful and aligned with the 2015 Paris Agreement under the United Nations Framework Convention on Climate Change.
- engage with investee companies/ entities to address ESG risks and trends impacting or with the potential to impact portfolio investments.

The Sub Fund believes that the integration of ESG risk analysis could help to enhance long-term risk adjusted returns for investors. The Investment Manager shall assess whether the companies in which the investments are made follow good governance practices. The Investment Manager must report on this. In addition, the Sub Fund excludes companies based on conduct.



## e) "Proportion of investments"

The asset allocation of the (Sub-)Fund and the extent to which the (Sub-)Fund has direct or indirect exposures in investee entities can be found in the investment limits and guidelines.

Cash is for liquidity management and hedging instruments are to manage currency exposure of the Sub-Fund. For other investments that are not part of the (Sub-)Fund's sustainability strategy, there are no binding criteria to consider minimum environmental and/or social safeguards. This is either due to the nature of the assets, where at the time of the preparation of the (Sub-)Fund's documents there are no legal requirements or standard market procedures on how to consider minimum environmental and/or social safeguards for such assets or investments are specifically excluded from the sustainability strategy, which are then also not subject to the consideration of minimum environmental and/or social safeguards.

## f) "Monitoring of environmental or social characteristics"

The environmental and/or social characteristics promoted by the (Sub-)Fund and the sustainability indicators used to measure the fulfilment of these environmental and/or social characteristics are subject to an initial qualitative review by the ESG Office of Universal Investment against the strategy pursued

- (a) upon the launch of a (Sub-)Fund to be classified as an Article 8 (Sub-)Fund under the Disclosure Regulation,
- (b) upon a (Sub-)Fund transfer from another management company/AIFM or
- (c) upon a change of classification of an Article 6 (Sub-)Fund into an Article 8 (Sub-)Fund.

The individual sustainability strategy of the (Sub-)Fund is contractually agreed and disclosed in pre-contractual documents of the (Sub-)Fund. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by the Investment Controlling department of the management company/the AIFM and additionally the portfolio manager in the case of outsourced portfolio management mandates.

MSCI data as well as the portfolio manager's own research or data from third-party providers are used, whereby the portfolio manager's research is checked by Investment Controlling.

The control of outsourced portfolio management companies takes place initially when the portfolio managers are appointed and on an ongoing basis, e.g. by means of specific ESG reports. External controls are carried out regularly by auditors in examining the annual reports and at the state level by the national supervisory authority.

## g) "Methodologies for environmental or social characteristics"

The E/S characteristics and the E/S indicators are monitored by the investment managers on a regular basis as part of the investment process and by applying restrictions on the exclusion list, regularly measuring restrictions and controls. In this way the Sub-Fund uses the E/S indicators to measure if the promoted E/S characteristics are achieved. Adherence to the exclusion list is monitored by the risk department of the Management Company. In addition, the appointed Investment Managers will take account of ESG factors in selecting, retention and realisation of investments as well as taking into account if the companies in which is invested follow good governance practises. An external specialist will be appointed to provide active ownership services to the Sub- Fund although the Investment Managers will be expected to engage with companies held in their portfolios as well. The Investment Managers engagement will be monitored to ensure they support the objectives of their mandate.

## h) "Data sources and processing"

Data from ISS, Sustainalytics, Trucost, CDP, Hermes is used to attain each of the environmental and/or social characteristics promoted by the (Sub-)Fund.

Investment managers use multiple data sources including ISS, MSCI, S&P, Bloomberg and Sustainalytics.

Investment managers may use their internal research as a check for the external data providers. If there is a discrepancy, the manager will investigate and can ignore the data source if incorrect.

## i) "Limitations to methodologies and data"

ESG data like ESG scores depend on the methodology used by the provider MSCI or Sustainalytics. The qualification of a green bond depends on the assement made by Bloomberg. And WACI is compiled by ISS applying their internal measurement process.



## j) "Due diligence"

The (Sub-)Fund's underlying assets are managed by the Management Company/AIFM exclusively in the interest of the investors and in accordance with strict statutory and regulatory requirements.

Before the assets are acquired, portfolio management checks whether the asset can be acquired in accordance with the legal and contractual requirements. Effective arrangements are in place through the establishment and application of written policies and procedures to ensure that investment decisions made on behalf of the (Sub-)Fund are consistent with its objectives, investment strategy and, where applicable, risk limits. After the assets have been acquired, a further corresponding daily check is carried out by the investment controlling department of the Management Company/AIFM and on an ongoing basis by the portfolio manager. The internal control of these due diligence obligations is carried out in the Risk Controlling department as the second line of defence and at a downstream level by the Internal Audit department as the third line of defence.

The control of outsourced portfolio managers is carried out by means of ISAE or comparable reports. These reports are evaluated by subject matter experts of the Management Company/AIFM within the framework of outsourcing controlling. Before commencing business activities in new products or new markets, including the acquisition of assets, the Management Company/AIFM ensures that the associated risks and the impact on the overall risk profile of the (Sub-)Fund are appropriately captured, measured, monitored and managed.

When complying with their respective duties, the Management Company/AIFM, the portfolio manager, in case the investment decision making is outsourced, or, if applicable, an appointed investment advisor, take into account sustainability risks and - at their entity level - the principal adverse impacts of investment decisions on sustainability factors.

The (Sub-)Fund's underlying assets are under the independent supervision, safekeeping and monitoring of the depositary. Further external controls are carried out regularly by auditors in examining the annual reports and at state level by the national supervisory authority.

# k) "Engagement policies"

The engagement policy of the Management Company/the AIFM is exercised in the form of voting. In order to safeguard the interests of the investors in the managed (Sub-)Fund and to fulfil the associated responsibility, the management company/the AIFM shall exercise the shareholder and creditor rights from the shareholdings held in the managed (Sub-)Fund in the interests of the investors. The decision-making criterion for the exercise or non-exercise of voting rights for the management company/the AIFM shall be the interests of the investors and the integrity of the market as well as the benefit for the investment fund concerned and its investors.

The Management Company/AIFM shall base its domestic voting on voting guidelines ("Voting Guidelines"). These Voting Guidelines shall be considered as the basis for the responsible management of the capital and the rights of the investors.

For votes abroad, the management company/the AIFM shall use to the respective country-specific guidelines of Glass Lewis, which take into account the local framework conditions. In addition, the Glass Lewis Guidelines "Environmental, Social & Governance ("ESG") Initiatives" are applied to the specific country guidelines and are used as a matter of priority. The application of these guidelines ensures that the voting criteria are country-specific and based on transparent and sustainable corporate governance policies as well as other environmental and social criteria aimed at the long-term success of the companies held by investment funds (so-called portfolio companies).

These voting standards used are based on the interests of the (Sub-)Fund managed by the management company/the AIFM and are therefore in principle applied to all (Sub-)Fund, unless it is necessary to deviate from these voting guidelines for individual (Sub-)Fund in the interest of investors, market integrity or the benefit for the respective investment fund.

The management company/the AIFM shall publish the principles of its participation policy and an annual participation report on its website

The Asset Manager, if the portfolio management is outsourced, or an appointed investment adviser, if applicable, may take further action to meet environmental and/or social characteristics as part of their corporate engagement activities. However, this engagement is not done on behalf of the (Sub-)Fund.

#### I) "Designated reference benchmark"

This (Sub-)Fund has not designated an index as reference benchmark to meet the environmental and/or social characteristics promoted by the (Sub-)Fund.

## m) "Status and document version"

Version	Date	Description
1.0	01.01.2023	First Version