

**Template periodic 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:** MARCH RAIF SA SICAV-RAIF – MARCH ENDOWMENTS  
**Legal entity identifier:** 213800YOK9JL6VOJK525

**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 include 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

**Did this financial product have a sustainable investment objective?**

**Yes**

**No**

It made **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 made **sustainable investments with a social objective:** \_\_\_%

It promoted **Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 22.1% 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 promoted E/S characteristics, but **did not make any sustainable investments**



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

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

*This financial product invests in a broadly diversified global portfolio of securities, promoting environmental and social characteristics through its investment process. The transferable securities will include: selected investments in equity securities (including real estate investment trusts (REITS) and infrastructure equity securities), investments in units of other UCIs (including absolute return strategies), exchange traded funds (ETFs), as well as, to a lesser extent, debt securities and commodities (including ETCs). The financial product will invest globally with no specific geographical focus. In addition, from time to time the Compartment may use options in isolation, or in combination with underlying assets, to express a view on a given position, to generate income, or to protect the financial risk of underlying assets. Each asset in the portfolio has its environmental and social features examined as part of the investment process, providing each asset and the aggregated portfolio with an internal ESG rating. This internal rating, which is based on the degree of promotion of each individual asset comprising the portfolio, is obtained using data and methodology from leading ESG providers. Among other features, this financial instrument promotes:*

- a.** *Environmental features: Environmentally sound governance and processes are important, as are sustainable resource utilization (energy, water, and land), a decrease in emissions (carbon, waste, and air pollution), and improved environmental footprints from suppliers and goods.*
- b.** *Social features: It promotes better employee relationships and working conditions, skill-enhancing training, and a reduction in accidents.*

Furthermore, it encourages improvements in the customer experience and accountability in the effects the company's product has on its customers and its products.

In compliance with the provisions of the RAIF Law, the investment strategy of this financial product is based on the principle of risk diversification. The investment objective of this financial product is to provide long-term capital appreciation and income growth. The financial product is actively managed in line with its strategic asset allocation. The Investment Manager integrates sustainability risks and opportunities into its research, analysis and investment decision-making processes.

This product applies, in its investment strategy, exclusion criteria based on March AM's exclusion policy currently in effect for SRI products, which is based on three main blocks and considers environmental and social aspects and indicators in addition to extra-financial analysis carried out to choose the assets that are part of the product portfolio. As a rule, the Sub-Fund opposes and, therefore limits investment in companies whose main activity involves the manufacture of controversial weapons, thermal coal, tobacco, adult content, gambling, GMO's and alcohol. Additionally, the investment manager conducts a norm-based analysis to determine whether the company complies with the 10 principles of the United Nations Global Compact for each of the four categories comprising the pact (Human Rights, Labor, Environment, and Anti-Corruption), given the fact that the company is a signatory partner of the UNGC. Based on this analysis, companies that display evidence of violating one or multiple principles are eligible for exclusion. The investment manager is implementing screening criteria to monitor holdings for compliance with the investment manager's exclusionary screening.

A "best in class" strategy is used in the analysis of all assets comprising the portfolio, based on the investee's position within its sector or industry (using data and methodology from main ESG providers). For sovereign debt assets, the percentile that the nation occupies within a specific universe is established using information and methods of the aforementioned providers due to the lack of an industry percentile with which its sector or industry. As a minimum requirement, 50% of the financial product's assets (including UCIs through a look-through analysis) are invested belonging to the first two quartiles.

Finally, in accordance with article 8 of the SFDR, at least 50% of the financial product's assets promote environmental or social features; such sustainability promotion is based on a March AM ESG rating of 25 or less out of 100. (The best possible rating is 1, while 100 is the worst). In other words, at least 50% of the portfolio's assets are rated at or below 25.

The investment strategy and its binding elements summarised above were followed to achieve the financial product's E/S characteristics.

#### ● **How did the sustainability indicators perform?**

To measure the attainment of the environmental and/or social characteristics of the product, a wide range of sustainable indicators are considered at the environmental level such as energy efficiency targets, use of renewable energies, total energy consumption, water consumption efficiency target, recycled water ratio, greenhouse gas emissions, waste treatment, indirect cost of supplier emissions, degree of environmental impact of products, environmental investments, environmental risk analysis, and the existence and analysis of the company's environmental team and its training.

On a social level, we have considered not only objectives linked to the company and its environment but also to the rest of the stakeholders. The main sustainable indicators used on the social side are the existence of union policies and representation, training hours, employee days lost vs. total days, employee satisfaction, flexible working hours, remuneration and working conditions, employee turnover, occupational accident rate, occupational fatality rate, occupational health and safety incidents, diversity among its employees, employees with disabilities, rate of women in the company and among the management team, level of satisfaction among its customers, privacy policies, the existence of supplier management policies, the existence of whistleblowing policies, company community involvement projects and employment and local impact.

In the Sovereign Debt part of the financial product's portfolio, the sustainable

*indicators used are as follows:*

- a. At the environmental level, three indicators are used: carbon intensity, renewable energy consumption, and energy intensity.*
- b. At the social level, three indicators are used: life expectancy, ease of access to secondary education, and wealth per capita.*
- c. At the governance level, six indicators are used: voting rights, political stability, government effectiveness, regulatory quality, equality of rights, and corruption control.*

*It must be specified that, at this precise moment, the coverage to collect all these sustainable indicators is heterogeneous and, in some circumstances, weak or non-existent, even when employing trusted specialist data providers. Due to the present lack of data, it is feasible that the product manager is now unable to evaluate one or some sustainable indicators mentioned. Nevertheless, the financial product manager(s) will continuously assess whether data availability has improved enough to potentially include the indicator into consideration in the investment process.*

*The consideration of all above-mentioned sustainability indicators has been crucial to achieve the following milestones:*

- 1) March Endowments has achieved an overall ESG rating (which covered the sustainability indicators mentioned) of 19.3 a rating that places the fund in the high end of the low ESG risk range (0 is the best possible rating, while 100 is the worst possible one).*
- 2) In accordance with article 8 of the SFDR and the products commitment, at least 50% of the financial product's assets promotes environmental or social features; such sustainability promotion is based on a March AM ESG rating of 25 or less out of 100 (0 is the best possible rating, while 100 is the worst possible one). At the end of the period, Endowments' 76.2% of the assets promote environmental or social features through hold a rating of less than 25 which far exceeds the product's commitment.*
- 3) In accordance with the financial product's commitment, at least 50% of the fund's assets (including UCIs through a look through analysis) will be invested in assets belonging to the first two industry quartiles as part of the best-in-class strategy applied to the assets comprising its portfolio. At the end of the period, Endowments' 70.1% of the assets were invested in assets belonging to the first two industry quartiles.*
- 4) The Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors were considered through the consideration within our sustainable investment framework of those investment in companies without carbon reduction initiative, and the adherence to the following exclusion criteria applied for direct investments:
  - a. Securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues*
  - b. Securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons and white phosphorus)*
  - c. Securities issued by companies that derive more than 30% of their revenue from thermal coal extraction*
  - d. Securities issued by utility companies that generate more than 30% of their revenues from coal fired power generation.*
  - e. Securities issued by companies involved in the production of tobacco with more than 20% of their revenues.*
  - f. Moreover, specific exclusion criteria for direct investments was applied (ex-ante to each investment decision):**

- i. Investments in issuers domiciled in oppressive regimes ("Not Free" by the Freedom House Index, World Bank's Governance Indicators and/or the Economist Intelligence Unit's Democracy Index).
- ii. Securities issued by companies involved in adult content – pornography (> 15% of the revenues involved).
- iii. Securities issued by companies involved in gaming/betting (> 15% of the revenues involved).
- iv. Securities issued by companies involved in genetically modified organisms (> 15% of the revenues involved).
- v. Securities issued by companies involved in the production of alcoholic beverages (> 15% of the revenues involved will required to have a responsible drinking policy).

5) The minimum exclusion criteria, as well as specific exclusion criteria were based on information from an external data provider and coded in pre- and post-trade compliance.

The performance of the sustainable indicators is reported in the PAI table (page 9). These indicators were not subject to an assurance provided by auditors or a review by third parties.

● **...and compared to previous periods?**

Not Applicable (NA).

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The product commits to hold sustainable investments in its portfolio as defined by the Sustainability Disclosure Regulation (EU) 2019/2008 (SFDR). Investments classified as sustainable that follow this regulation reached a minimum of 5% of the portfolio. They were investments that, in accordance with the regulation's definition, contribute to one or multiple environmental or social goals, did not do significant harm to any other environmental or social objectives, and adhere to good corporate governance principles.

For this product, investments fulfilled one of the requirements listed below in order to be deemed sustainable:

For Equities and Corporate Debt:

- a. Their involvement in a well-defined GHG emissions reduction strategy aligned with the goals of the Paris Agreement; we use the worldwide project "Science Based Targets Initiative (SBTi)" to select these investments. SBTi is a partnership between the World Resources Institute (WRI), the UN Global Compact, the Carbon Disclosure Project (CDP), and the World Wildlife Fund for Nature (WWF). The SBTi initiative:
  - Defines and promotes best practices in emissions reduction and net-zero emissions targets, in line with climate science.
  - Provides technical assistance and expert resources to companies setting science-based targets (SBTs).
  - Brings together a team of specialized experts to provide companies with independent advice and technical validation of their objectives.
  - Is the Business Ambition for 1.5°C campaign lead partner, which is an urgent call to action from a worldwide coalition of UN agencies, business and industry leaders that aims to mobilize enterprises to establish net-zero SBT targets aligned with a 1.5°C future.

The financial product selects investments that have a reduction target in place

or are committed to reducing their GHG emissions in accordance with the Paris Agreement targets. Additional information on the SBTi initiative can be found on the following website: <https://sciencebasedtargets.org/>

- b. Had a measurable impact within the framework of the United Nations' 17 Sustainable Development Goals (SDGs), which are designed to spearhead the eradication of poverty and other forms of deprivation by e enhancing health and education, reducing inequality, safeguarding the environment, and boosting prosperity. The selection process was based on the analysis of companies whose activity, management model and results are aimed at mitigating general social problems and the planet's resource sustainability identified by the SDGs. The degree of alignment with each of the 17 SDGs was monitored through data from external suppliers of recognized solvency; at the same time, the percentage of company revenues directly linked to the SDGs was analysed.*
- c. Measurable impact indicators: Specific metrics related to SDG activities were regularly examined and monitored (using data from top-tier knowledgeable and established creditworthiness suppliers). These metrics are analysed at the company level and gauge the success or failure of the organization's operational or governance practices.*

*The process of identifying the associated key adverse impacts-those that can do significant harm to any environmental or social objective (DNSH under SFDR)-was undertaken at the time of selecting assets in which to invest. The above-mentioned internal exclusion criteria and norm-based analysis based on the UN Global Compact served as the foundation for this screening. The UN Global Compact- March AM is a signatory partner of it- is a global initiative that encourages companies to act in a way that advances social objectives and the implementation of the SDGs by incorporating 10 universal principles relating to human rights, labour, the environment, and anti-corruption into their corporate and operational strategies.*

*The fund only considered sustainable investments for those companies with a low or moderate level of controversies, excluding from this part of sustainable investments all companies with a significant, high, or severe level of controversies. In addition to this negative screening, we considered the level and importance of controversies produced by the companies invested by the portfolio using data from external providers.*

*The companies in which the portfolio has investments exercise solid corporate governance. Protecting the company's value was our highest priority when it comes to governance. In our view, a management team must have objectives aligned with those of its minority shareholders. The fund manager should analyse the alignment of companies' management teams and boards of directors with the shareholders.*

*More specifically, key variables considered when analysing the governance practices of the management teams and boards of the companies analysed were quality & integrity, structure, ownership & shareholder rights, remuneration, audit and financial reporting and stakeholder governance. Reputable third-party data providers were used to carry out the analysis. Except for those categorized as "underperformers" or "laggards," only companies whose governance is assessed as "leader," "outperformer," or "average performance" were considered as companies that the fund manager deemed to be sustainable investments.*

*This financial product also allows investment in green, social or sustainability-linked bonds or commercial paper/note programs. These are fixed-income debt instruments that allow issuers:*

*To finance or refinance initiatives/activities that have a positive environmental impacts;*

*To raise funds for initiatives that address social problems or have a positive social impacts; and,*

*To raise money for initiatives with a positive environmental and social impact, combining both objectives.*

*Depending on the projects that this product finances, the financial product*

*considers this type of investment as sustainable (if they promote environmental characteristics in accordance with Art. 8 of the Disclosure Regulation (SFDR)) or as taxonomy (if they contribute to one or more of the environmental goals outlined in Art. 9 of the Taxonomy Regulation (EU) 2020/852).*

#### *For Sovereign debt*

*As part of the analysis process for considering sovereign debt investments as sustainable, 12 quantifiable and trackable metrics (compiled by renowned ESG providers from reputable and authoritative sources such as the World Bank and the UN) are examined to quantify the environmental, governance, and social commitment of nations.*

*Three indicators linked to wealth per capita, ease of access to secondary education, and life expectancy will be assessed for the social component, according to World Bank guidelines.*

*Three indicators linked to energy intensity, renewable energy consumption, and carbon intensity will be assessed for the environmental component, according to World Bank guidelines.*

*Six indicators linked to voting rights, political stability, government effectiveness, regulatory quality, equal rights and control of corruption will be assessed for the governance component, in accordance with World Bank guidelines.*

*The sustainability percentage in Sovereign Debt investments will be quantified using an internal valuation model based on the aforementioned metrics, excluding the consideration of a sustainability percentage in those nations deemed to have a significant impact on any environmental or social objectives measured by the metrics.*

*In this respect, a maximum sustainability factor of 50% will be given to the top-ranked nation. This sustainability factor will linearly decline as it moves up in the ranking. The model score (based on the 12 metrics examined) will be multiplied by the resulting sustainability percentage for each country, obtaining the sustainable investment percentage for each country. The sustainable investment percentage for nations not located in the top quartile of the sample under study is zero percent.*

*Furthermore, this financial product allows investment in green, social or sustainability-linked bonds or commercial paper/note programs. Depending on the projects that this product finance, the financial product considers this type of investment as sustainable (if they promote environmental characteristics in accordance with Art. 8 of the Disclosure Regulation (SFDR)).*

#### *For Undertakings for Collective Investment (UCIs)*

*The selection of UCIs comprising the financial product's portfolio is made using specialized sustainability analysis tools and ESG criteria, as well as information obtained through consultations with well recognised & public databases (i.e. the databases of the EU, the OECD and international organizations) and the European ESG Templates (EETs) of asset management firms.*

*Investees' environmental and social characteristics are analysed (look-through) as part of the investment process, providing an internal ESG rating for each individual asset and the aggregate portfolio. March AM's internal rating, which is based on the degree of promotion of each individual asset in the portfolio, is obtained using data and methodology from renowned ESG providers.*

*For this financial product, investments must meet one (if not more) of the requirements listed below to be deemed sustainable:*

*For UCIs targeting sustainable investments (as described in Art. 9 of the Taxonomy Regulation (EU) 2020/852), 100% of the position shall be considered as sustainable investments in this product.*

*For those UCIs promoting environmental or social characteristics (in accordance with Article 8 of the Disclosure Regulation (SFDR)), the minimum committed percentage of sustainable investment reflected in the respective sustainability annex (Annex II) will be considered as sustainable.*

*Additionally, a periodic analysis of the product's actual percentage in sustainable investments will be carried out (through the look-through and its respective Annex IV), which in most cases will greatly exceed this minimum percentage.*

However, only the minimum percentage of sustainable investment committed in its respective sustainability annexes will be considered as a conservative criterion.

Sustainable investments have contributed to reduce GHG emissions as its direct involvement in the SBTi initiative is part of the criteria for sustainable investments selection in this financial product (as mentioned above). Additionally, sustainable investments contributed to UN Sustainable Development Goals (SDG) as its direct contribution to these SDGs is part of the criteria for sustainable investments selection in the equities and corporate debt part; in the same way, for UCIs, the minimum sustainable investment commitment is considered therefore both elements (SDG contribution and GHG emissions reduction) are considered. The assessment is done internally using third party data providers.

**How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

The process of identifying the associated key adverse impacts-those that can do significant harm to any environmental or social objective (DNSH under SFDR)-is undertaken at the time of selecting assets in which to invest. The above-mentioned internal exclusion criteria and norm-based analysis based on the UN Global Compact serve as the foundation for this screening.

The UN Global Compact- March AM is a signatory partner of it- is a global initiative that encourages companies to act in a way that advances social objectives and the implementation of the SDGs by incorporating 10 universal principles relating to human rights, labour, the environment, and anticorruption into their corporate and operational strategies.

The financial product only considers sustainable investments for those companies with a low or moderate level of controversies, excluding from this part of sustainable investments all companies with a significant, high, or severe level of controversies. In addition to this negative screening, we consider the level and importance of controversies produced by the companies invested by the portfolio using data from external providers.

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

PAI indicators were considered either as part of the application of the exclusion criteria or through thresholds on a relative or absolute basis. Thresholds have also been defined referring to qualitative or quantitative criteria.

All mandatory PAIs and some optional ones as set in RTS Annex I Table I and II have been considered.

The present coverage to collect the necessary data is heterogeneous and, in some circumstances, weak or non-existent, even when employing trusted specialist data providers to access PAI indicators. Due to the lack of data, it is feasible that the product manager is now unable to evaluate some investment PAIs.

Additionally, the coverage of data related to water, waste is reduced, and the related PAIs indicators are considered through the exclusions of severe controversies within the UN Global Compact (norm-based analysis). In that circumstance, it is important to note that the financial product may have problems to increase the data coverage of some PIA indicators. However, the financial product manager(s) will periodically assess whether data availability has improved enough to potentially include the data into consideration in the investment process.

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

The Investment Manager's sustainable minimum exclusion list screens

**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.



out companies based on, between others, their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights, and are embedded in the Sustainable Development Goals.



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

*This financial product weighs in (addresses, avoids, and/or mitigates) on the main adverse impacts on sustainability factors (PAI indicators) considering certain social indicators linked to applicable exclusion criteria together with other environmental indicators linked to carbon emission reduction initiatives.*

*As aforementioned, PAIs are primarily considered and integrated into the decision-making process through exclusions. The Investment Managers might find difficulties when evaluating some investment PAIs due to the lack of data. Nevertheless, the Investment Manager will assess if data availability has improved enough to include it in the investment decision process.*

*All Mandatory PAIs and some optional ones as set in RTS Annex I Table I and II were quantified but not fully considered in this period.*

*The EU Taxonomy sets out a “do not significant harm” principle which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria*

*The “do not 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.*



PAI	ISSUER	PILLAR	COMPULSORY NATURE	COVERAGE	DATA 2023	UNITS	Threshold	Situation
M1 - Total GHG emissions	Company	Environmental	Mandatory	94.03%	4,808.94	tonne CO2e	-	-
M2 - Carbon footprint	Company	Environmental	Mandatory	94.03%	368.11	tonne CO2e / EURM invested	< 1000	Met
M3 - GHG intensity of investee companies	Company	Environmental	Mandatory	94.06%	659.04	tonne CO2e / EURM revenue	< 600	Met
M4 - Exposure to companies active in the fossil fuel sector	Company	Environmental	Mandatory	93.63%	14.66	%	< 20%	Met
M5.1 - Share of non-renewable energy consumption	Company	Environmental	Mandatory	88.20%	63.12	%	-	-
M5.2 - Share of non-renewable energy production	Company	Environmental	Mandatory	99.98%	56.03	%	-	-
M6 - Energy consumption intensity per high impact climate sector	Company	Environmental	Mandatory	99.36%	0.48	GWh / EURM revenue	< 2.5	Met
M7 - Activities negatively affecting biodiversity sensitive areas	Company	Environmental	Mandatory	92.39%	14.64	%	-	-
M8 - Emissions to water	Company	Environmental	Mandatory	9.16%	0.00	tonne / EURM invested	-	-
M9 - Hazardous waste	Company	Environmental	Mandatory	94.11%	0.90	tonne / EURM invested	< 750	Met
O2 - Emissions of air pollutants	Company	Environmental	Optional	17.74%	0.14	tonne / EURM invested	-	-
O4 - Investments in companies without carbon emission reduction initiatives	Company	Environmental	Optional	100.00%	44.07	%	< 95%	Met
O6.1 - Water usage	Company	Environmental	Optional	40.12%	1265.77	m³ / EURM invested	-	-
O6.2 - Water recycling	Company	Environmental	Optional	8.95%	7.64	%	-	-
O7 - Investing in companies without water management initiatives	Company	Environmental	Optional	94.68%	2.60	%	-	-
O8 - Exposure to areas of high water stress	Company	Environmental	Optional	92.74%	0.08	%	-	-
O9 - Investments in companies producing chemicals	Company	Environmental	Optional	96.43%	0.01	%	-	-
O13 - Non-recycled waste ratio	Company	Environmental	Optional	77.55%	156	tonne / EURM invested	-	-
O15 - Deforestation	Company	Environmental	Optional	94.14%	72.81	%	-	-
M10 - Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Company	Social	Mandatory	92.39%	0.00	%	0 (in direct Investments)	Met
M11 - Lack of processes and compliance mechanisms to monitor compliance with UNGC and OECD-GME	Company	Social	Mandatory	94.76%	0.67	%	< 10%	Met
M12 - Unadjusted gender pay gap	Company	Social	Mandatory	56.57%	8.26	%	< 25%	Met
M13 - Board gender diversity	Company	Social	Mandatory	94.32%	37.92	%	> 25%	Met
M14 - Exposure to controversial weapons	Company	Social	Mandatory	94.20%	0.00	%	0	Met
O1 - Investment in investee companies without workplace accident prevention policies	Company	Social	Optional	94.41%	2.20	%	-	-
O2 - Rate of accidents	Company	Social	Optional	75.42%	4.26	number of accidents per million hours worked	-	-
O3 - Number of workdays lost to injuries, accidents, fatalities or illness of investee companies	Company	Social	Optional	24.26%	11955.57	number of working days lost per year	-	-
O4 - Lack of a supplier code of conduct	Company	Social	Optional	94.80%	3.25	%	-	-
O5 - Lack of grievance/complaints handling mechanism related to employee matters	Company	Social	Optional	94.76%	0.59	%	-	-
O6 - Insufficient whistleblower protection	Company	Social	Optional	93.54%	0.81	%	-	-
O7.1 - Number of incidents of discrimination reported in investee companies	Company	Social	Optional	92.39%	0.24	number of incidents	-	-
O7.2 - Number of incidents of discrimination leading to sanctions in investee companies	Company	Social	Optional	92.39%	0.00	number of incidents leading to sanctions	-	-
O8 - Excessive CEO pay ratio	Company	Social	Optional	3120%	220.23	-	-	-
O9 - Lack of a human rights policy	Company	Social	Optional	94.76%	4.98	%	-	-
O10 - Lack of due diligence	Company	Social	Optional	80.87%	12.33	%	-	-
O11 - Lack of processes and measures for preventing trafficking in human beings	Company	Social	Optional	94.46%	5.81	%	-	-
O14 - Number of identified cases of severe human rights issues and incidents	Company	Social	Optional	92.39%	0.02	-	-	-
O15 - Lack of anti-corruption and anti-bribery policies	Company	Social	Optional	94.98%	10.3	%	-	-
O16 - Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery.	Company	Social	Optional	92.39%	0.00	number of cases	-	-
O17.1 - Number of convictions for violation of anti-corruption and anti-bribery laws	Company	Social	Optional	92.39%	0.00	-	-	-
O17.2 - Amount of fines for violation of anti-corruption and anti-bribery laws	Company	Social	Optional	92.39%	3,478.01	million EUR	-	-
M15 - GHG intensity (sovereigns)	Government	Environmental	Mandatory	58.99%	477.62	tonne CO2e / EURM GDP	< 1000	-
M16.1 - Relative number of investee countries subject to social violations	Government	Social	Mandatory	78.53%	0.00	-	0 (in direct Investments)	Met
M16.2 - Absolute number of investee countries subject to social violations	Government	Social	Mandatory	78.53%	0.00	-	0 (in direct Investments)	Met
O18 - Average income inequality	Government	Social	Optional	78.24%	32.75	-	-	-
O19 - Average freedom of expression	Government	Social	Optional	78.53%	0.96	-	-	-
O20 - Average human rights performance	Government	Social	Optional	77.88%	2.57	-	-	-
O21 - Average corruption score	Government	Social	Optional	78.53%	1.12	-	-	-
O22 - Non-cooperative tax jurisdictions	Government	Social	Optional	78.53%	0.00	-	-	-
O23 - Average Political Stability	Government	Social	Optional	78.53%	0.27	-	-	-
O24 - Average Rule of law	Government	Social	Optional	78.53%	1.16	-	-	-



## What were the top investments of this financial product?

A portion of the financial product contained assets other than assets which did not promote environmental or social characteristics. Examples of such assets are derivatives, cash and deposits. As these assets were not used to attain the environmental or social characteristics promoted by the financial product, they were excluded from the determination of top investments.

The main investments are the investments with the largest weight in the financial product. As the product was launched at the end of Q3 and started investing in Q4, the weight is calculated at year-end. The top investments of this financial product at the year-end are as follows:

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 2023

Largest investments	Sector	% Assets	Country
PART. BLUEORCHARD MICROFIN-NEUH.	Funds	3.81%	Switzerland
PART. JPMF INV-JAPAN ST VAL I JPY	Funds	3.50%	Japan
PART. DPAM B REAL ESTATE EMU DIV SUST E	Funds	3.16%	Belgium
PART. DWS INVEST GL INFRASTRUCT USD FDM	Funds	3.05%	Luxembourg
PART. PACIFIC N. SOUTH EM EQ INC OPP I	Funds	3.05%	Ireland
EUROPEAN INV BANK 2,75% 30/07/2030	Government	3.01%	Luxembourg
EUROPEAN UNION 3,125% 05/12/2028	Government	2.98%	Luxembourg
PART. BARINGS EUROLOAN A EUR DIST	Funds	2.91%	Luxembourg
PART. AXA WF EURO CREDIT SHORT DUR I EUR	Funds	2.86%	France
PART. POLAR CAPITAL GLOBAL INSURANCE I U	Funds	2.80%	UK

ACC. 3I INFRASTRUCTURE	Financial	2.09%	UK
ACC. QUALCOMM INC	Technology	2.03%	US
ACC. BNP PARIBAS	Financial	1.97%	France
ACC. NIKE INC	Consumer, Cyclical	1.96%	US
PART. M&G (LUX) GLOBAL FLOATING RATE HIG	Funds	1.95%	Luxembourg



## What was the proportion of sustainability-related investments?

### Asset allocation

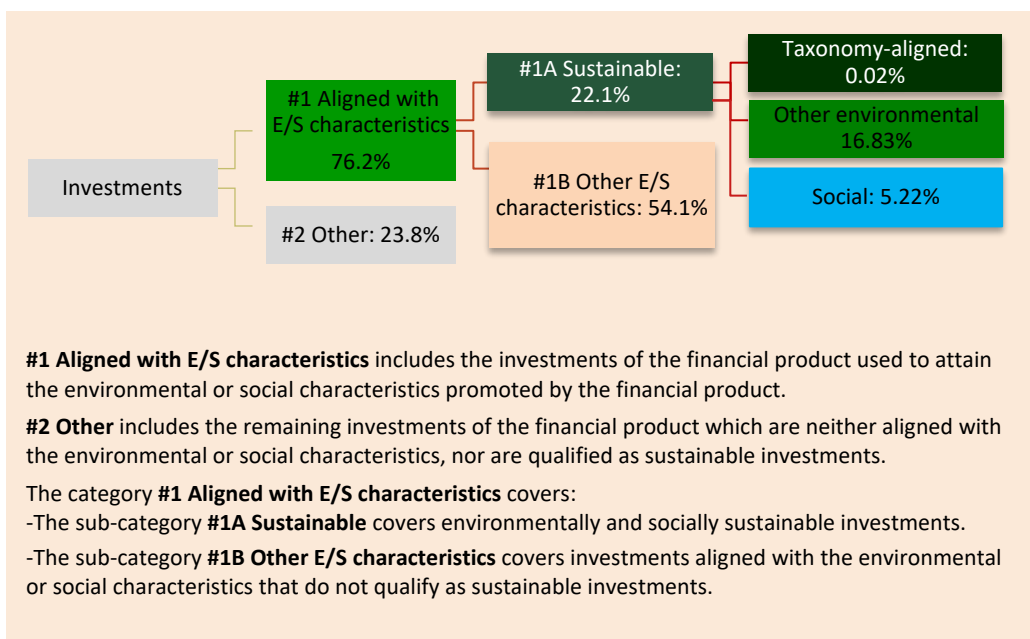
describes the share of investments in specific assets.

The majority of the assets were used to meet the environmental or social characteristics promoted by this Sub-Fund. A lower portion of the product contained assets which did not promote environmental or social characteristics. Examples of such instruments are derivatives, cash and investment with temporarily divergent or absent environmental, social, or good governance qualifications.

The proportion of sustainable investments reached, at the end of the period considered is a 22.1% of the financial product assets under management.

### What was the asset allocation?

Some business activities may contribute to more than one sustainable sub-category (social, taxonomy aligned or other environmental). This can lead to situations, in which the sum of the sustainable sub-categories do not match to overall number of the sustainable category. Nonetheless, no double counting is possible on the sustainable investment overall category.



### In which economic sectors were the investments made?

The table below shows the shares of the Sub-Fund's investments in various sectors (industry sector) and subsectors (industry group) at the end of the financial year. The

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.

analysis is based on the BICS classification of the company or issuer of the securities in which the financial product is invested.

The reporting of sectors and sub-sectors of the economy that derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council is currently not possible, as the evaluation includes BICS classification of Industry Sectors and Industry Groups. The fossil fuels activities mentioned above are considered aggregated with other activities under several Industry Groups.

<b>Sector / Sub-sector</b>	<b>% Assets</b>
<b>Basic Materials</b>	<b>3.66%</b>
Mining	3.66%
<b>Communications</b>	<b>5.54%</b>
Internet	1.25%
Telecommunications	4.29%
<b>Consumer, Cyclical</b>	<b>4.97%</b>
Apparel	3.88%
Retail	1.10%
<b>Consumer, Non-cyclical</b>	<b>14.63%</b>
Beverages	1.31%
Cosmetics/Personal Care	1.10%
Food	2.91%
Healthcare-Products	1.65%
Pharmaceuticals	7.65%
<b>Energy</b>	<b>2.77%</b>
Oil&Gas	2.77%
<b>Financial</b>	<b>5.77%</b>
Banks	1.97%
Closed-end Funds	2.09%
Diversified Finan Serv	1.13%
Investment Companies	0.58%
<b>Funds</b>	<b>35.06%</b>
Alternative Investment	1.90%
Asset Allocation Fund	1.43%
Commodity Fund	0.95%
Debt Fund	15.22%
Equity Fund	12.40%
Real Estate Fund	3.16%
<b>Government</b>	<b>13.58%</b>
Multi-National	3.01%
Sovereign	10.57%
<b>Industrial</b>	<b>0.98%</b>
Machinery-Diversified	0.98%
<b>Technology</b>	<b>5.99%</b>
Computers	1.06%
Semiconductors	3.71%
Software	1.23%
<b>Utilities</b>	<b>1.64%</b>
Electric	1.64%
<b>Other (not sectorized)</b>	<b>5.40%</b>



## To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

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.

*This financial product, which: a) promotes environmental characteristics in accordance with Article 8 of the Disclosure Regulation (SFDR) as stated in the section “To what extent were the environmental and/or social characteristics promoted by this financial product met?” and b) partially invests in economic activities that contribute to one or more environmental or social objectives (as stated in the section “What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?”) may contribute to one or more of the environmental goals outlined in Art. 9 of the Taxonomy Regulation (EU) 2020/852, including but not limited to:*

- 1. The prevention and control of pollution;*
- 2. The mitigation of climate change;*
- 3. The adaptation to it;*
- 4. The sustainable use and conservation of water and marine resources;*
- 5. The transition to a circular economy; and,*
- 6. The preservation and restoration of biodiversity and ecosystems*

*At the end of the period, the sustainable investments with an environmental objective aligned with the EU taxonomy represent a 0.02% of the assets.*

*The methodology used to assess the proportion of sustainable investments aligned with the EU Taxonomy is compliant with what is contained in Art. 3 of EU Taxonomy regulation in order to disclose the extent to which sustainable investments with an environmental objective were aligned with the EU taxonomy.*

*Regarding the breakdown of the proportion of the investments per each of the environmental objectives set out in Art. 9 of the Taxonomy Regulation (EU) 2020/852 to which those investment contributed, we must state that it is currently not possible to break down the shares of investments by environmental objectives, as the data is not yet available in a verified form..*

*Even if the data is provided by external data providers, we must specify that the data were not subject to an assurance provided by auditors or a review by third parties.*

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

Yes

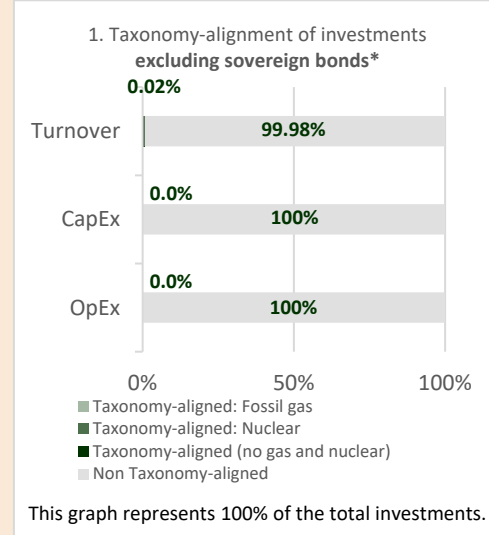
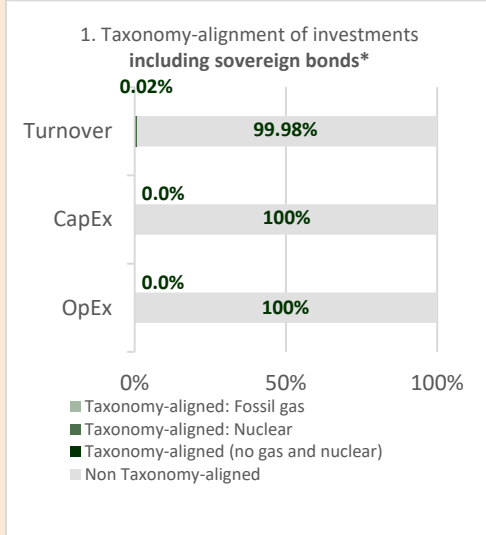
In fossil gas

In nuclear energy

No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The graphs below show in green the percentage of investments that were 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.

As of the reporting date the reliable data on taxonomy-alignment was available only for the degree to which the aggregated investments were in environmentally sustainable economic activities based on turnover. Therefore, the corresponding values for operational and capital expenditures are displayed as zero.

● **What was the share of investments made in transitional and enabling activities?**

The financial product's Investment Manager has not committed to a split of minimum taxonomy alignment into transitional, enabling activities and own performance. Currently the Investment Manager does not have complete, verifiable and up-to-date data to review all investments with respect to the technical assessment criteria for enabling and transitional activities as set out in the Taxonomy Regulation. Therefore, the corresponding values on the enabling and transitional activities are stated as 0%.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Not Applicable (NA).

... are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The financial product invested in economic activities that were not Taxonomy-aligned. The financial product's share of sustainable investments with an environmental objective not aligned with the EU Taxonomy was 16.83%.



### **What was the share of socially sustainable investments?**

*The financial product's share of sustainable investments with a social objective was 5.22%.*



### **What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?**

*There is a percentage of the portfolio (23.8%) that contained a) instruments with an ESG rating higher than 25, which means that it does not promote environmental or social features and may or may not have strong governance and b) other instruments such as derivatives, cash and investment with temporarily divergent or absent environmental, social, or good governance qualifications.*

*It should be highlighted that this part of the portfolio faithfully complied with the exclusion criteria set out in the Binding Elements of the Investment Strategy.*

*The purpose of these investments was to contribute to the long-term performance of the fund and an ongoing analysis will be made of their ESG risks and their evolution therein. In the long term, the percentage of this section may be reduced, as companies that do not align and improve will eventually be excluded due to the risks they may incur (reputational, litigation, sanctions, etc.).*



### **What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

*In order to face the main objectives set out in its Sustainability Strategy and to meet the environmental and/or social characteristics, March AM has developed a number of agreements with first class ESG data, research and processes providers focussed in:*

- *ESG data, rating and research providers integrating (per company and universe & portfolio aggregated)*
  - *ESG Rating*
  - *Controversies analysis*
  - *Governance analysis*
  - *Product involvement (exclusion) analysis*
  - *Norms based analysis (global standards screening)*
  - *EU Taxonomy analysis*
  - *SDG impact metrics analysis*
- *Proxy voting worldwide first class provider which allows*
  - *The analysis of all shareholder meetings regarding all holdings in March AM's equity products.*
  - *Shareholder vote analysis, decision and execution through a unified platform.*
- *Fund of funds look-through data provider*

*March AM has developed, through its risk control department, an internal ESG tool which integrates and processes the data of the ESG data providers mentioned and which results in a proprietary March AM's ESG rating system which facilitates the Fund management team the necessary extra financial analysis. This tool integrates into one single interface the ESG rating, controversies analysis, governance analysis, exclusion analysis, norms based analysis, taxonomy alignment, SDG alignment, PAI analysis and fund of funds portfolio look-through analysis. This analysis is done at both the investible universe and at each particular financial product levels. Additionally, this tool allows for an ex-ante ESG analysis, previous to each investment decision and the control performed by March AM's risk control & compliance department which*

guarantees the compliance of our legal obligations according to SFDR.

Asset allocation is based on an in-house fundamental analysis. For this purpose, the Firm analyse the Investee's Annual and Periodic Financial Reports (Annual Reports, Balance Sheet, Annual Accounts, Cash Flow Statements, etc.), as well as the main Non-Financial Reports of the companies. Additionally, the governance structure and controversies surrounding the corporation are examined.

Furthermore, Fund's Investment Managers hold regular meetings with investees' companies. It is not guaranteed that the meetings include issuers held by every fund. ESG matters, in addition to purely financial factors, are frequently discussed in the aforementioned meetings to analyse the development, commitment and vocation for improvement of these, as well as the measures taken by the investees' in this regard. In order to promote a combination of both social and environmental product characteristics in accordance with Art.8 of SFDR, the investment strategy aims to benefit companies with strong ESG ratings while detracting from and/or reducing the portfolio weight of companies with poor ESG ratings. The rating is based on an in-house ESG analysis, which uses top-tier external providers' data as a source, complemented with the managers' fundamental view.

The monitoring of environmental and/or social characteristics will be made at the starting point of the extra financial analysis of a potential investment decision (ex-ante) and, once the investment decision is taken, will be frequently monitored embedded and through our proprietary (March AM) ESG rating tool (which considers between other those characteristics) based on first class third party ESG data providers.

Engagement is not specifically part of the environmental or social investment strategy of this product. Nevertheless, March AM sets out in its engagement policy long-term involvement in its products' investee companies/issuers, thus demonstrating its firm intention to evolve towards a sustainable economy where long-term profitability (with an appropriate level of risk) is combined with environmental protection and social justice while influencing better decision-making in the investee companies (the so-called active ownership).

March AM believes that fostering an open, informal dialogue with companies/issuers and encouraging ESG practices in them can enhance its own investment process, enabling it to appropriately manage the long-term risks of its portfolios.

Improving the strategy, management, and reporting of each company's significant ESG issues helps protect the value of March AM's investments. Firm seeks to achieve this objectives through dialogue and engagement with investee companies in order to gain a thorough understanding of the business models, risks, and opportunities as well as through the adoption of changes in them. It is not guaranteed that the engagement conducted includes issuers held by every fund.

In this sense, March AM has adhered during the period to 2 collaborative engagement platforms, one environmental - Climate Action 100+ - as a contributing investor and another social related – Advance - as a participant and endorser.

March AM generally rejects investing in businesses or nations that engage in abhorrent, reprehensible practices that contravenes international treaties and agreements. The introduction of exclusion criteria for certain areas of activity is compatible with the incorporation of ESG criteria in investment analysis and processes. If an investee company comprising the Fund's portfolio has a high level of controversies and a low ESG rating, the manager (directly/indirectly) will encourage (on a best-efforts basis) an open, informal dialogue with the issuers to adopt the necessary measures to change the practices or controversial activities. In the event that the activity carried out by the issuer is inconsistent with the aspects mentioned in this policy, the manager has the option to divest.



### **How did this financial product perform compared to the reference benchmark?**

No specific index has been defined to determine the alignment of the product with these characteristics.

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



- ***How does the reference benchmark differ from a broad market index?***

*Not Applicable (NA).*

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

*Not Applicable (NA).*

- ***How did this financial product perform compared with the reference benchmark?***

*Not Applicable (NA).*

- ***How did this financial product perform compared with the broad market index?***

*Not Applicable (NA).*