



**TOCQUEVILLE**

# **TOCQUEVILLE VALUE EUROPE ISR**

Prospectus

UCITS compliant with European Directive 2009/65/EC

17/12/2024

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# 1. General features

## 1.1 Form of the UCITS

### 1.1.1. Company name

TOCQUEVILLE VALUE EUROPE ISR (hereinafter the “Fund”)

### 1.1.2. Legal form and Member State in which the Fund was incorporated

Fonds Commun de Placement (investment fund) incorporated under French law.

### 1.1.3. Inception date and expected lifetime

The Fund was created on 20 July 1984 for a term of 99 years.

### 1.1.4. Fund overview

ISIN Code	Distributable sums allocation	Base currency	Subscribers	Minimum initial subscription amount <sup>(2)</sup>	Amount of subsequent subscriptions
Unit AD: FR0013484037	Accumulation and/or distribution (and/or carry forward) Possibility of interim dividend	EUR	All investors, more specifically intended to serve as a unit-linked vehicle for GMO and ASCENDO life insurance policies offered by La Banque Postale Group	One unit	One ten-thousandth of a unit
Unit I: FR0010600239	Accumulation	EUR	All investors	1,000 units	One ten-thousandth of a unit
Unit I-N: FR0011524396	Accumulation	EUR	All investors, more specifically intended for institutional investors	€25,000,000	One ten-thousandth of a unit
Unit K: FR0011612951	Accumulation	EUR	All investors, more specifically intended for institutional investors	1,000 units	One ten-thousandth of a unit
Unit P: FR0010547067	Accumulation	EUR	All investors, more specifically intended to be subscribed in an ordinary securities account (CTO – compte-titres ordinaire) or to serve as a unit-linked vehicle for life insurance policies offered by La Banque Postale Group entities other than those mentioned for the AD unit	One unit	One ten-thousandth of a unit
Unit S: FR0013245420	Accumulation	EUR	Intended for distribution by financial intermediaries other than management companies <sup>(1)</sup>	One unit	One ten-thousandth of a unit

(1) Subscription of this unit class is limited to investors subscribing through distributors or intermediaries, other than the Management Company (as defined below);

- whose national law forbids any inducements to distributors (i.e the United Kingdom and the Netherlands); or
- who provide services such as:
  - advice within the meaning of MiFID 2014/65;
  - individual discretionary portfolio management;
  - and for which they are exclusively remunerated by their clients.

(2) In the case of proprietary investments, the Management Company is not required to comply with the stated minimum.

### 1.1.5. Available information

The latest annual and interim reports are available on the website [www.lfde.com](http://www.lfde.com) or may be sent to unitholders within eight business days on written request to: LA FINANCIERE DE L'ECHIQUIER, 53 Avenue d'Iéna 75116 Paris

If required, additional information may be obtained from the Management Company by telephoning +33 (0)1.47.23.90.90.

### 1.1.6. Other documents made available

La Financière de l'Echiquier has adhered to the shareholder engagement policy of the LBP AM group and delegated the exercise of voting rights to LBP AM. The LBP AM Group's shareholder engagement policy is available at [www.lbpam.com](http://www.lbpam.com). The report on the implementation of the shareholder engagement policy is available at [www.lfde.com](http://www.lfde.com)

These documents, as well as the policy for the transmission of inventories allowing any unitholder to request an inventory in accordance with the procedures contained in this policy, may be sent, within 8 business days, upon written request from the unitholder to LA FINANCIERE DE L'ECHIQUIER (53 Avenue d'Iéna 75116 Paris).

## 1.2 Parties involved

### 1.2.1. Management Company

The Management Company was authorised by the AMF (Autorité des Marchés Financiers) on 17/01/1991 under number GP 91004 (general licence).

LA FINANCIERE DE L'ECHIQUEUR

53 Avenue d'Iéna

75116 Paris

### 1.2.2. Depositary and custodian

CACEIS Bank (registered office: 89-91 Rue Gabriel Péri - 92120 Montrouge, France; postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France), a public limited company with a board of directors, approved on 1 April 2005 by the CECEI as a bank and investment services provider (the "Custodian").

CACEIS Bank is responsible for the custody of the Fund's assets and for ensuring that the Management Company's decisions are lawful.

The Custodian's duties include the duties, as defined by the applicable regulations, of safekeeping assets, checking the legality of the Management Company's decisions and monitoring the UCIs' cash flows. The Custodian is independent of the Management Company. A description of the delegated custody functions, a list of CACEIS Bank's delegates and sub-delegates and information concerning any conflicts of interest that may result from such delegations are available on the CACEIS website: [www.caceis.com](http://www.caceis.com). Updated information is made available to investors on request from CACEIS Bank.

### 1.2.3. Statutory auditor

Deloitte & Associés (185 Avenue Charles de Gaulle – 92524 Neuilly-sur-Seine Cedex), represented by Olivier Galienne.

### 1.2.4. Distributor

LA FINANCIERE DE L'ECHIQUEUR

53 Avenue d'Iéna

75116 Paris

The Management Company draws investors' attention to the fact that certain distributors may not be mandated or known to it insofar as the Fund's units are listed on Euroclear.

### 1.2.5. Delegatee

#### Accounting management:

CACEIS Fund Administration (registered office: 89-91 Rue Gabriel Péri - 92120 Montrouge, France; postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France), a public limited company. The accounting manager is responsible for accounting and calculating the net asset value.

#### Administrative management: institutions responsible for keeping the issuing account:

- for units registered or to be registered in the shared electronic registration system:

IZNES, a simplified joint-stock company, approved by the ACPR as an investment firm on 26 June 2020; registered office: 18 Boulevard Malesherbes, 75008 Paris – France

- for all other units:

CACEIS BANK (registered office: 89-91 Rue Gabriel Péri - 92120 Montrouge, France; postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France), a public limited company with a board of directors, approved on 1 April 2005 by the CECEI as a bank and investment services provider

Each of the institutions will assume all tasks relating to issuing account keeping according to the breakdown defined above, with CACEIS BANK being in charge of aggregating information relating to issuing account keeping provided by IZNES at the UCI level.

The UCI's Management Company has not detected any conflicts of interest that may arise from delegation of the issuing account keeping to IZNES and CACEIS BANK.

### 1.2.6. Advisor

None.

### 1.2.7. Centralising agent and institution appointed by the Management Company to receive subscription and redemption orders

The Management Company has delegated all the tasks of centralising subscription and redemption orders to the following institutions:

- for units registered or to be registered in the shared electronic registration system:

IZNES, a simplified joint-stock company, approved by the ACPR as an investment firm on 26 June 2020; registered office: 18 Boulevard Malesherbes, 75008 Paris – France

- for all other units:

CACEIS BANK (registered office: 89-91 Rue Gabriel Péri - 92120 Montrouge, France; postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France), a public limited company with a board of directors, approved on 1 April 2005 by the CECEI as a bank and investment services provider.

Each of the institutions will, by delegation of the Management Company, assume all tasks relating to the processing of subscription and redemption orders for the UCI's units, and according to the distribution defined above, with CACEIS BANK being responsible for aggregating information relating to the processing carried out by IZNES at Fund-level.

## 2. Operating and management procedures

### 2.1 General features

#### 2.1.1 Characteristics of units

**Nature of rights attached to the unit class:** each unitholder has a co-ownership right to Fund assets in proportion to the number of units owned.

**Liabilities management:** liabilities management is provided by IZNES for the units to be registered or registered in the shared electronic registration system and by the Custodian (CACEIS Bank) for the other units. Units registered in bearer form are listed on EUROCLEAR France. Administered registered units are recorded in the liabilities manager's register. Pure registered units are registered by the Management Company in the shared electronic registration system.

**Voting rights:** as this is a mutual fund, no voting rights are attached to the units, as decisions are taken by the Management Company.

**Form of units:** bearer, administered registered or pure registered, with pure registered exclusively concerning units to be registered in the IZNES shared electronic registration system for investors with access to that system.

**Sub-division of units:** subscriptions and redemptions are carried out in ten-thousandths of units, referred to as "fractional units".

**Fair treatment of unitholders:** The Management Company has put in place a system to ensure compliance with the principle of fair treatment of unitholders.

In principle, no preferential treatment is granted except in the following cases:

- preferential financial treatment granted, where applicable, to certain unit classes benefiting from management fees differentiated according to a minimum subscription, marketing network, etc.: details of these treatments are provided in the "Fees and Commissions" section of the prospectus;
- preferential treatment granted in terms of access to inventories: all unitholders may access the inventories of their UCIs, in accordance with the policy on the transmission of inventories available on the Management Company's website. However, for certain unitholders subject to the supervision of the ACPR/AMF or equivalent authority of another State, this access may be achieved by means of automated dispatch of the invested UCITS's inventories, whether or not carried out transparently;
- preferential financial treatment granted in the form of a retrocession of management fees (i.e. negotiated rebate), where applicable, to certain investors. These preferential financial treatments are granted for reasons justifying a retrocession of management fees, such as a significant subscription commitment or a long-term investment commitment. As part of its collective management and

individual discretionary management activities, the Management Company may grant negotiated discounts to clients with whom it has a legal or economic relationship. Preferential treatment may be granted in particular to collective investments managed by the Management Company, in their capacity as investor, due to the dual collection of management fees by the Management Company in its capacity as manager of the target fund and the fund of funds. The share of fees thus passed on to internal funds of funds may be different from that granted to external investor funds.

It should be noted that retrocessions of management fees granted to distributors or companies investing in the name and on behalf of portfolios that they manage are not considered preferential treatments.

More detailed information on the portfolio of assets under management may be provided by the Management Company at the request of existing or potential clients.

#### 2.1.2 Year-end

Last NAV calculation day in December.

#### 2.1.3 Tax regime

The Fund is not subject to corporation tax and a tax transparency regime applies to unitholders. The tax regime applicable to amounts distributed by the UCITS or to the UCITS's unrealised or realised capital gains or losses depends on the tax provisions applicable to the subscriber's particular situation and/or the fund's investment jurisdiction. If investors are not sure about their tax situation, they should contact their professional tax adviser.

The fund is eligible for the PEA. As a result, at least 75% of its net assets will be invested in equities of European Union countries.

#### FATCA status of the Fund enabling it, where applicable, to benefit from more favourable tax provisions

The Fund qualifies as "deemed compliant financial institutions listed in II-B of Appendix 2 of the IGA" (*non-reporting French FI/ deemed compliant/certain collective investment vehicles*).

#### Indications relating to the Automatic Exchange of Information (AEOI)

To meet the requirements of the Automatic Exchange of Information (AEOI), the Management Company may be required to collect and disclose information about the Fund's unitholders to third parties, including the tax authorities, in order to transmit it to the relevant jurisdictions. This information may include (but is not limited to) the identity of the unitholders and their direct or indirect beneficiaries, the ultimate beneficiaries and the persons controlling them. Unitholders will be required to comply with any request from the Management Company to provide this information in order to enable the Management Company to comply with its reporting obligations.

Unitholders should consult an independent tax adviser for any information relating to their particular situation.

## Indications on the automatic exchange of information in relation to cross-border arrangements (DAC6)

To meet the requirements of the automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements, the Management Company may be required to collect and disclose information about the Fund's unitholders to third parties, including the tax authorities, in order to transmit it to the relevant jurisdictions.

This information may include (but is not limited to) the identity of the unitholders and their direct or indirect beneficiaries, the ultimate beneficiaries and the persons controlling them. Unitholders will be required to comply with any request from the Management Company to provide this information in order to enable the Management Company to comply with its reporting obligations. In the absence of a response from the unitholder, in the event that the arrangement is considered reportable, or in the absence of one of the required elements, the Management Company will be obliged to report certain information about the unitholder and the arrangement to the relevant tax authorities.

Unitholders should consult an independent tax adviser for any information relating to their particular situation.

## 2.2 Specific features

### 2.2.1. ISIN codes

AD Units : FR0013484037  
 I Units : FR0010600239  
 I-N Units : FR0011524396  
 K Units : FR0011612951  
 P Units : FR0010547067  
 Unit S : FR0013245420

### 2.2.2. Investment objective

The objective of the Tocqueville Value Europe ISR mutual fund is to invest in European equity markets, by selecting securities that meet socially responsible investment criteria (according to the Management Company's analysis) and whose valuation is deemed undervalued by the Management Company ("Value"), while seeking to limit the risks of significant fluctuations in the portfolio.

### 2.2.3. Benchmark

The Fund is actively managed. The MSCI Europe Net Total Return index is used retrospectively as a performance benchmark. The management strategy is discretionary and unconstrained by the index.

The Fund is managed using a pure stock selection approach, without reference to an index or a business sector. It is therefore not subject to any benchmark index. However, in order to allow unitholders to make ex-post performance comparisons, it is possible to compare the Fund's performance with that of the MSCI Europe Net Total Return index (composed of European equities) converted into euros and calculated net dividends reinvested.

### 2.2.4. Investment strategy

#### 1. Strategy used

Securities are selected in two stages: the first consists of analysing a universe of securities (hereinafter, the "Analysis Universe") based on socially responsible investment (SRI) criteria, in order to determine the selectivity threshold of 20%, while the second aims to pick stocks that may not be included in the Analysis Universe.

1. The Analysis Universe, made up of the stocks in the STOXX Europe Total Market index<sup>(1)</sup>, is analysed using socially responsible investment (SRI) criteria in order to identify companies with the best practices in terms of sustainable development according to the Management Company's analysis, and thereby determine the selectivity threshold to be respected.

This analysis is based on the GREaT score, a proprietary analysis methodology of the LBP AM group that uses the analysis of the four following pillars:

- responsible governance: the purpose of this pillar is to assess the organisation and effectiveness of powers within each issuer (for example, for companies: to assess the balance of powers, executive compensation, business ethics or tax practices);

(1) The STOXX Europe Total Market index is an index representative of European equity markets. The STOXX Europe Total Market index is calculated and published by its administrator STOXX Ltd. The STOXX Europe Total Market is used by the Fund within the meaning of Regulation (EU) 2016/1011 of the European Parliament and of the Council. The administrator of the benchmark index is included in the register of administrators and benchmarks kept by the ESMA. Additional information on this benchmark index is available on the following website: <https://www.stoxx.com/indices>. In accordance with Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016, the Management Company has a procedure for monitoring the benchmark indices used, describing the measures to be implemented in the event of substantial changes to an index or should that index no longer be provided.

- sustainable resource management: this pillar makes it possible, for example, to study environmental impacts and human capital for each issuer (for example, quality of working conditions or management of relations with suppliers);
- economic and energy transition: this pillar makes it possible, for example, to assess each issuer's strategy to support the energy transition (for example, greenhouse gas reduction approach, response to long-term challenges); and
- regional development: for example, this pillar makes it possible to analyse each issuer's strategy in terms of access to basic services.

Several criteria are identified for each pillar and monitored using indicators collected from extra-financial rating agencies. The Management Company uses the GREaT rating as a quantitative decision-making tool to exclude the lowest-rated securities. The methodology implemented makes it possible to reduce biases, particularly capital or sector biases, which could artificially improve the rating through allocation decisions.

The Management Company's exclusion list serves as a second filter. An exclusion committee draws up a list of exclusions after analysing ESG controversies or allegations, defined in particular as severe and systematic legal breaches or ESG violations without corrective measures. The exclusion list also includes controversial sectors such as tobacco, coal and gambling.

After applying these two filters (exclusion committee and quantitative rating), 20% of securities are removed from the Analysis Universe on the basis of extra-financial considerations (lowest-rated and/or excluded securities), so as to define the Fund's SRI investment universe (hereinafter, the "**Reduced Universe**") (a "selective" approach), corresponding to ESG integration with significant engagement in management.

The Management Company then carries out its own qualitative analysis of issuers. Where applicable, it may propose a change to the quantitative rating, this change being subject to approval by an *ad hoc* committee. The Management Company remains the sole judge of the investment opportunity and the extra-financial quality of the issuers, which is expressed according to a final rating of between 1 and 10 – with the SRI rating of 1 representing a low extra-financial quality and the SRI rating of 10 representing a high extra-financial quality.

2. Based in particular on this Reduced Universe, the Fund may invest in all markets of the European Union or the European Economic Area, focusing more particularly on equities of companies whose securities are neglected and/or undervalued by the market, in a situation of economic downturn (due to a reorganisation, an improvement in the business climate, etc.), or that are defensive in nature due to the quality of the balance sheet and/or the regular and sustainable dividend paid and/or their actual assets.

Management of the Fund is based on total independence from business sectors. No business sectors will be particularly preferred. Similarly, the size of the target company, its market capitalisation and its listing market will not be taken into account. These companies will be chosen from among large, medium and

small caps according to their economic and stock market interest, according to the Management Company's analysis.

The stocks will be chosen following financial and extra-financial research (according to the three ESG criteria) carried out internally.

The Management Company therefore simultaneously and systematically takes into account:

- the "Environment" criterion, under which the following elements are taken into account: scope 1 & 2 CO<sub>2</sub> emissions (note that the Management Company has chosen not to include scope 3 due to problems with the accessibility and reliability of data on said scope 3 and, more generally, due to the lack of comparability of data between companies), the quantity of waste generated and recycled, etc.
- the "Social" criterion, under which the following elements are taken into account: employee turnover, the percentage of women in management, the number of accidents, etc.
- the "Governance" criterion, under which the following factors are taken into account: the percentage of independent directors on the Board of Directors, on the Appointments and Remuneration Committees, the percentage of women on the Board, the implementation of an anti-corruption system, etc.

The securities are selected mainly within the Reduced Universe but may also be selected, outside the Reduced Universe and the Analysis Universe, on stock markets in the European Union or the European Economic Area, up to a maximum of 10% of the Analysis Universe and provided they have a better SRI rating than the thresholds set under the approach, in order to ensure that these securities have a limited ability to distort the calculation.

In any event, 90% of the portfolio's net assets (calculated on securities eligible for extra-financial analysis: equities and debt securities issued by private and quasi-public issuers) are permanently comprised of securities subject to extra-financial analysis. Although government securities are subject to an ESG assessment, the results of the assessment are not taken into account in a measurable manner in the SRI strategy described above. These government securities may represent a maximum of 25% of the Fund's net assets. Investments in government securities are made based on internal analyses of the financial and extra-financial quality of issuers. These are based on analyses by macroeconomic strategists, financial analysts and SRI analysts.

At least 75% of the Fund's total assets will be exposed to equities of European Union countries, with a very large proportion of equities listed in euros.

The Fund is exposed to currency risk and will not in principle be hedged.

Note that the Fund has a restrictive SRI approach but does not meet the requirements of the French SRI label.

## Statements relating to consideration of sustainability risks and the European taxonomy

### Consideration of sustainability risks and the negative impacts of investment decisions on sustainability factors:

In accordance with Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (the Sustainable Finance Disclosure Regulation or SFDR), the Fund aims to achieve its investment objective while integrating into its investment process both sustainability risks (as defined below) and the negative impacts of its investment decisions on sustainability factors. The policy for taking into account sustainability risks and the policy for taking into account the negative impacts of investment decisions on sustainability factors are detailed in the report on Article 29 of the French Energy-Climate Law available on the Management Company's website (<https://www.lfde.com> on the Responsible Investment page).

**Further information on the Fund's environmental and/or social characteristics is available in the SFDR appendix to this document.**

**Consideration of the European taxonomy<sup>(2)</sup>:**

The six objectives of the European taxonomy are taken into account in the extra-financial rating provided by LBP AM. Companies whose activity contributes to achieving the European taxonomy's environmental objectives are therefore favoured by the rating tool. However, the rating assigned to each security is the result of a global and systematic analysis that also takes into account criteria linked to social objectives.

The Fund undertakes to invest at least 0% in activities aligned with the European taxonomy.

In this case, the principle which states "do no significant harm" applies only to underlying investments which take into account European Union criteria in matters of environmentally sustainable economic activities and not the remaining portion of the underlying investments. The investments underlying the remaining portion of this financial product do not take into account the criteria of the European Union in matters of environmentally sustainable economic activities.

The fund can also invest up to 25% in equities not eligible for the PEA and from all geographical regions. However, equities on all regulated markets in non-OECD countries (emerging markets) are also authorised up to a limit of 10% of the Fund's total net assets.

**2. Techniques and instruments used**

**a) Assets (excluding embedded derivatives)**

**Equities**

As a mutual fund eligible for the PEA, at least 75% of the portfolio is invested in corporate securities eligible for the PEA. Issuers of securities eligible for the PEA have their registered office in a Member State of the European Union or in another State party to the Agreement on the European Economic Area (EEA) that is not a member of the European Union that has entered into a tax treaty with France containing an administrative clause to combat tax avoidance and evasion. These equities will be chosen without reference to an index, a basket of indices or a business sector. Similarly, the size of the company and the amount of its market capitalisation are not a selection criterion for this Fund's managers.

Equities on all regulated markets in non-OECD countries (emerging markets) are also authorised up to a limit of 10% of the Fund's total net assets.

**• Debt securities and money-market instruments**

Bonds, treasury bills and other negotiable debt securities (short-term negotiable securities, BTANs) up to a limit of 25% of the Fund's total net assets.

Based on the investment universe defined above (geographical area, maturity), the Management Company conducts an internal credit risk analysis to select or sell a security. The Management Company does not therefore automatically and exclusively use ratings provided by rating agencies but integrates its own analysis to assess the rating and so decide on its acquisition, retention in assets or disposal.

These investment vehicles will be denominated in euro and have a minimum rating of BBB (i.e. investment grade) according to Standard & Poor's or equivalent or considered as such by the management team. The credit risk assessment is based on the Basel method, which stipulates that if the security is rated by the main existing rating agencies, the agency rating used is (i) the lowest of the two best, if the security is rated by at least three agencies; or (ii) the lowest of the two ratings, if the security is rated by only two agencies; or (iii) the rating issued by the only agency that has rated the security, if the security is rated by only one agency) or a rating deemed equivalent by the Management Company, subject to the issuer's eligibility with regard to the internal analysis of the security's risk/return profile (profitability, credit, liquidity, maturity).

Unrated bond issues or issues with ratings below Investment Grade may not exceed a limit of 5%, subject to the issuer's eligibility based on the internal analysis of the security's risk/return profile (profitability, credit, liquidity, maturity). Unrated securities must undergo an internal assessment by the Management Company

If the issue is not rated, the issuer or guarantor rating will replace the issue rating, incorporating the level of subordination of the issue if necessary.

**UCITS and AIFs**

The Fund may invest up to 10% of its net assets in units or shares of French and/or European AIFs and UCITS and AIFs that meet the four criteria of Article R214-13 of the French Monetary and Financial Code. These UCITS and/or AIFs will be either short-term money market UCIs, equity UCIs from European Union countries, or listed index-linked UCIs (ETFs or trackers<sup>(3)</sup>). The underlying UCIs will be selected in order to achieve the Fund's objective and/or to invest the Fund's cash.

The Fund may invest in funds of the Management Company or an associate company. If these are not internal UCIs, there may be disparities in the SRI approach between those adopted by the Fund's Management Company and those adopted by the Management Company managing the selected external UCIs. Moreover, these UCIs will not necessarily have an SRI approach.

(2) The term refers to Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to promote sustainable investments, known as the "Taxonomy" regulation.

(3) UCIs, SICAVs or equivalent instruments issued under foreign law that replicate, either directly or through investment, the securities comprising an index (for example: FTSE MTS Global, FTSE MTS 3-5 years, Iboxx, etc.) and continuously tradable on a regulated market.



In any event, the Fund's Management Company will favour the selection of UCIs with an SRI approach compatible with its own philosophy.

## b) Derivatives

### Type of markets:

The Fund may invest in futures and options traded on French or foreign regulated markets.

### Risks to which the manager seeks exposure:

Equity risk.

### Type of operations:

The manager may take positions:

- to expose the portfolio to equity risk for a maximum of 10% of the net assets;
- to expose the portfolio to equity risk for a maximum of 25% of the net assets.

### Type of instruments used:

It may invest in plain vanilla listed futures and options (listed equities or listed equity indices).

The Fund is prohibited from trading in credit derivatives.

### Strategy for using derivatives to achieve the investment objective:

Forward financial instruments are used:

- in pursuit of the investment objective;
- to make inflow adjustments, particularly in the event of significant subscription and redemption flows for the UCITS;
- in order to adapt to certain market conditions (major market movements, better liquidity or efficiency of financial futures, for example).

Index equity derivatives: these instruments will be used to hedge equity risk. They may also be used temporarily to expose portfolios. The Management Company believes that index derivatives are not used to guide the ESG performance of funds.

Single-name equity derivatives: the purchase or sale of single-name equity derivatives is possible for hedging or temporary exposure purposes, provided that the same level of requirement in terms of the portfolio's ESG performance is met before and after single-name derivatives are taken into account. To do this, the underlying security of the derivative will be valued using the same ESG methodology as the physical securities. "Temporary" refers to a term of less than one year (including roll). Short-selling of a security, either directly or synthetically, is not permitted. The portfolio will comply with a minimum of 50% physical securities, a single-name derivative hedging limit of 20% and a maximum exposure of 150%.

It should be noted that these forward derivatives will only be used on an exceptional basis, over a very short period, in order to deal with significant movements in liabilities that could not be traded on the markets. The Fund is managed on a fully discretionary basis, without the implementation of systematic strategies.

The Fund's leverage on all markets (resulting from direct investment in financial instruments and the use of forward financial instruments) may not exceed 125% of assets (net leverage) or 200% of assets (gross leverage).

The Fund is prohibited from trading in credit derivatives.

## c) Securities with embedded derivatives

None.

## d) Deposits

The Fund reserves the right to invest up to 20% of its net assets in deposits, mainly for cash management purposes.

## e) Cash borrowings

There is no intention that the Fund borrow cash. Nevertheless, an occasional temporary debit position may exist as a result of transactions linked to the Fund's flows (investments and divestments in progress, subscriptions or redemptions, etc.) up to a maximum of 10% of net assets.

## f) Securities financing transactions

### Types of transactions used

For the purposes of efficient portfolio management, the Fund may carry out temporary purchases and sales of securities (repurchase and reverse repurchase agreements for cash, securities lending and borrowing transactions).

### Type of trades, with all transactions being restricted to achieving the investment objective:

These transactions are intended to achieve the investment objective and in particular to enable the seizing of market opportunities with a view to improving the portfolio's performance, optimising cash management and the Fund's income.

### Types of assets that may be the subject of these transactions

The assets that may be the subject of these transactions are securities eligible for the investment strategy (debt securities and bond and money-market instruments as described above).

### Planned and authorised level of use

The Fund may carry out repurchase and reverse repurchase agreements, for up to 100% of net assets, and securities lending/borrowing transactions, for up to 10% of net assets.

### Selection of counterparties

A procedure for selecting the counterparties with which these transactions are entered into prevents the risk of a conflict of interest when carrying out these transactions.

Additional information on the counterparty selection procedure can be found in the "Fees and Commissions" section.

Counterparties used for temporary purchases and sales of securities are financial institutions with their registered office in the OECD and a minimum rating of BBB- at the time of execution of the transaction.

## Remuneration

Additional information on remuneration can be found in the “Fees and Commissions” section.

#### g) Contracts constituting financial guarantees

To achieve its investment objective, the Fund may receive and grant financial guarantees, in securities or cash, and reinvest the cash received as collateral only in units or shares of short-term money market UCIs, in high-quality government bonds, in reverse repurchase agreements of securities eligible for the investment strategy or in deposits with credit institutions.

Financial guarantees received comply with the following rules:

- Issuer credit quality: financial guarantees received in securities are either OECD government bonds, supranational bonds or covered bonds (with no maturity limit);
- Liquidity: financial guarantees received other than in cash must be liquid and traded at transparent prices;
- Correlation: the collateral is issued by an entity independent of the counterparty.
- Diversification: counterparty risk in over-the-counter transactions may not exceed 10% of net assets; exposure to a given guarantee issuer may not exceed 20% of net assets;
- Custody: any financial guarantee received is held with the Fund’s custodian or by one of its agents or third parties under its control, or by any third-party custodian subject to prudential supervision.

In accordance with its internal policy for managing financial guarantees, the Management Company determines:

- The level of financial security required; and
- The level of haircut applicable to assets received as collateral, in particular depending on the type, the credit quality of the issuers, their maturity, their reference currency and their liquidity and volatility.

In accordance with the valuation rules set out in this prospectus, the Management Company will carry out a daily valuation of the collateral received on the basis of market prices (*mark-to-market*). Margin calls will be made in accordance with the terms of the collateral agreements.

The financial guarantees received involving transfer of ownership will be held by the Fund’s custodian.

#### 2.2.5. Risk profile

The Fund will mainly be invested in financial instruments selected by the Management Company. These instruments will be subject to stock market changes and uncertainties.

The main risks to which the investor is exposed in respect of the techniques used are:

- **currency risk:** this corresponds to the risk of a fall in the various portfolio security currencies relative to the euro, the portfolio’s reference currency. Exposure to currency risk may represent up to 50% of assets in currencies other than the euro. This exposure may be reduced by using the various financial instruments presented as part of the investment strategy. However, a depreciation of the currencies in which the portfolio is invested against the euro could lead to a decrease in the Fund’s net asset value.
- **risk of capital loss:** capital loss occurs when a unit is sold for less than its price at the time of subscription. This risk is linked to the fact that the Fund is permanently exposed to equities, for at least 75% of its total assets, and does not offer any capital protection or guarantee. As a result, there is a risk that the capital invested may not be returned in full.
- **equity and market risk:** the Fund’s net asset value may experience volatility caused by the investment of a very large portion of the portfolio in equity markets. The Fund may be exposed directly or indirectly, via shares and/or units of UCITS and/or AIFs, to small- and mid-cap markets (less than €5bn and €10bn respectively). This exposure may potentially represent more than 50% of total assets. The volume of these securities listed on the stock exchange is low. As a result, market movements, both upward and downward, are more pronounced and more rapid than for large caps. The Fund’s net asset value will then follow this behaviour.

- **a risk associated with investments in small and mid-caps:** investors should be aware that, due to their specific characteristics, these small-cap equities may present volatility risks leading to a greater and faster decline in the Fund's net asset value. However, this type of investment will not be predominant in the management of the Fund.
- **discretionary management risk:** the discretionary management style is based on anticipating changes in the various markets (equities, bonds). There is a risk that the Fund might not be invested in the best-performing securities at all times.
- **interest-rate risk linked to changes in interest rates:** this is the risk of a fall in the value of fixed-income instruments resulting from changes in interest rates. It is measured by sensitivity. The Fund's net asset value may fall in periods of rising interest rates (positive sensitivity) or falling interest rates (negative sensitivity).
- **sustainability risk:** any environmental, social or governance event or situation that, if it occurs, could have an actual or potential negative impact on the value of the investment. More specifically, the negative effects of sustainability risks could affect companies in the portfolio via a series of mechanisms, especially: 1) lower revenues; 2) increased costs; 3) loss or depreciation in asset value; 4) higher cost of capital; and 5) fines or regulatory risks. Environmental, social and governance (ESG) criteria are integrated into the portfolio management process in order to take sustainability risks into account in investment decisions.

The ancillary risks associated with the techniques used are as follows:

- **liquidity risk:** this risk mainly applies to securities with a low trading volume and for which it is therefore more difficult to find a buyer/seller at a reasonable price at any time. This particularly arises in the case of large subscriptions/redemptions relative to the size of the portfolio.
- **risk associated with investments in emerging markets:** investing in emerging markets involves a high degree of risk due to the political and economic situation of those markets, which may affect the value of the Fund's investments. Their operating and monitoring conditions may differ from the standards prevailing on the major international markets. In addition, an investment in those markets involves risks related to restrictions on foreign investments, counterparties, higher market volatility, delays in settlements/deliveries, as well as reduced liquidity on certain lines comprising the Fund's portfolio.  
Maximum exposure to emerging markets is 10% of net assets.
- **credit risk linked to changes in yields or payment defaults relating to private issues.** An increase in the yield spreads of private issues in the portfolio, or even a default on an issue, may result in a decrease in the Fund's net asset value. This risk remains low due to both the secondary nature of investments in private issues and the diversification in terms of credit quality.

- **counterparty risk (associated with temporary purchases and sales of securities):** the Fund is exposed to the risk of non-payment by the counterparty with which the transaction is negotiated. This risk may cause a decline in the Fund's net asset value.

In addition to the counterparty risk presented above, the risks associated with temporary purchases and sales of securities may include liquidity risks, legal risks (the risk of inadequate drafting of contracts entered into with counterparties) and operational risks (settlement/delivery risk).

- **risk associated with the use of derivative financial instruments:** the strategies implemented via derivative financial instruments are derived from the management team's expectations. If market trends do not prove to be in line with the strategies implemented, this could lead to a decrease in the Fund's net asset value.

#### 2.2.6. *Guarantee or protection*

None.

#### 2.2.7. *Eligible investors and typical investor profile*

The AD units are intended for all investors and are specifically intended to serve as a unit-linked vehicle for GMO and ASCENDO life insurance policies offered by La Banque Postale Group.

The I units are intended for all investors.

The I-N and K units are intended for all investors and are particularly aimed at institutional investors.

The P units are intended for all investors and are specifically intended to be subscribed in an ordinary securities account (CTO – compte-titres ordinaire) or to serve as a unit-linked vehicle for life insurance policies offered by La Banque Postale Group entities other than those mentioned for the AD unit.

The S units are intended in particular for marketing by financial intermediaries other than the Management Company.

This Fund is intended for any investor (natural person or legal entity) who wishes to invest in a UCITS that invests more than 75% of its net assets in equity markets and who thereby accepts the risks associated with fluctuations in those markets.

The amount that can be reasonably invested in this Fund depends on each investor's personal situation. To determine this amount, investors should consider their personal wealth or assets, their current financial needs and needs at a minimum investment horizon of five years, as well as their inclination to assume risk or, conversely, to adopt a cautious investment profile. We also strongly advise investors to diversify their investments so that they are not wholly exposed to this fund's risks. Investors are therefore invited to review their particular situation with their financial advisor.

The Fund may be used as a unit of account for life insurance policies with a term of eight years or more.

It is expressly recalled that the UCITS concerned by this document may be subject to marketing restrictions with regard to legal or natural persons who, by reason of their nationality, residence, registered office/place of registration or for any other reason, are subject to a foreign jurisdiction that prohibits or limits the offer of certain products or services (in particular financial instruments).

• **Case of “US Persons”**

The units have not been, and will not be, registered under the *US Securities Act* of 1933 (hereinafter “the **1933 Act**”) or under any law applicable in a US state, and they cannot be directly or indirectly transferred, offered or sold in the United States of America (including its territories and possessions) or to any **US Person**, as defined by *Regulation S* of the *1933 Act* adopted by the *Securities and Exchange Commission* (or “**SEC**”, unless (i) the units have been registered or (ii) an exemption was applied with the prior consent of the Board of Directors.

The Fund is not, and will not be, registered under the *US Investment Company Act* of 1940. Any sale or transfer of shares in the United States of America or to a *US Person* may constitute a violation of US law and requires prior written consent from the Board of Directors. Persons wishing to purchase or subscribe for units will have to provide written certification stating that they are not *US Persons*.

The Fund’s Management Company has the power to impose restrictions (i) on the ownership of units by a *US Person*, and thus the power to conduct compulsory redemption of the units held, in accordance with the terms of the *Fund Rules*, and (ii) on the transfer of units to a *US Person*. This power extends to any person who: (a) appears to be directly or indirectly in violation of the laws and regulations of any country or government authority; or (b) may, in the opinion of the Fund’s Management Company, cause damage to the Fund that it would otherwise not have suffered.

The offering of units has not been authorised or rejected by the SEC, the specialist commission of a US state or any other US regulatory authority. Equally, said authorities have neither accepted nor dismissed the merits of this offering, nor the accuracy or suitability of documents relating to this offering. Any statement to the contrary is against the law.

Unitholders must immediately inform the Fund’s Management Company if they become a *US Person*. Any unitholder who becomes a *US Person* will no longer be permitted to acquire new units and may at any time be required to relinquish his/her units to someone who is not a *US Person*. The Fund’s Management Company reserves the right to make the compulsory redemption, in accordance with the terms of the *Fund Rules*, of any unit directly or indirectly held by a *US Person*, or any units held by a person in breach of the law or contrary to the interests of the Fund.

A definition of *US Person* is available at: <http://www.sec.gov/about/laws/secrulesregs.htm>.

• **Case of Russian and Belarusian nationals**

The units of the Fund are not open to subscription by investors affected by prohibition measures taken in accordance with the provisions of Article 5f of Council Regulation 833/2014 on restrictive measures in respect of Russian actions destabilising the situation in Ukraine, as amended. This prohibition applies to any Russian or Belarusian national, any natural person residing in Russia or Belarus, any legal person, entity or body established in Russia or Belarus.

**2.2.8. Recommended investment period**

More than 5 years.

### 2.2.9. Methods for determining and appropriating distributable sums

Distributable sums will be paid out within a maximum of five months following the financial year-end.

The I, I-N, K, P and S units are pure accumulation units for both Allocation 1 and Allocation 2.

The AD units are accumulation units and/or distribution units and/or carry-forward units for both Allocation 1 and Allocation 2.

### 2.2.10. Characteristics of the units and initial net asset value of the unit

The units are expressed in ten-thousandths and denominated in euros.

- Unit AD: €100
- Unit I: €100
- Unit I-N: €100
- Unit K: €100
- Unit P: €91.46
- Unit S: €100

### 2.2.11. Subscription and redemption procedures

Orders are executed in accordance with the table below:

T	T: date of establishment of the net asset value	T+1 working day	T+2 working days	T+2 working days
Centralisation of subscription and redemption orders before 2:30 pm	Execution of the order at the latest during day T	Publication of the net asset value	Delivery of subscriptions	Settlement of redemptions

Unitholders should be aware that orders transmitted to distributors other than the institutions mentioned above must take into account the fact that the cut-off time for centralising orders applies to said distributors in respect of CACEIS Bank. Consequently, those distributors may apply their own cut-off time, earlier than the cut-off time mentioned above, in order to take into account the time they take to transmit orders to CACEIS Bank.

Only investors with access to the IZNES shared electronic registration system may send their subscription and redemption orders to IZNES.

Subscriptions and redemptions may be made in amount or in number of units, divided into ten-thousandths.

#### Minimum subscription amount:

	Unit AD	Unit I	Unit I	Unit K	Unit P	Unit S
<b>Minimum initial subscription</b>	1 unit	1,000 units	EUR 25,000,000	1,000 units	1 unit	1 unit
<b>Minimum amount of the following subscriptions</b>	None	None	None	None	None	None

#### Redemption gate mechanism:

The UCI has a gate mechanism to cap redemptions. The Management Company may not execute in full redemption requests centralised on the same Net Asset Value in view of the consequences on liquidity management, in order to enable balanced management of the UCI and thus equal treatment of investors.

Calculation method and threshold used:

If, on a given centralisation date, the sum of redemption requests minus the sum of subscription requests represents more than five (5)% of the Net Assets, the Management Company may decide to trigger the gate provision to cap redemptions. The Management Company may decide to honour redemption requests above the five (5)% threshold if liquidity conditions permit it and thus partially execute redemption orders at a higher rate or in full. The mechanism for capping redemptions can be applied to 20 net asset values over 3 months and may not exceed 1 month if it is activated consecutively on each net asset value during 1 month. Information to unitholders if the provision is triggered:

If the redemption cap system is activated, investors and potential investors will be informed by the Management Company by any means via the Management Company's website or by any other appropriate means. Furthermore, Investors whose redemption requests have been only partially executed or not executed will be informed specifically by their account keeper as soon as possible after the centralisation date.

**Capping of redemption orders:**

All redemption requests will therefore be reduced proportionally and expressed as a decimal number of units (rounded up to the next decimal place, with the number of decimals in force for the UCI).

**Processing of non-executed orders:**

In the event of activation of the mechanism by the Management Company, requests for redemptions of units not fully honoured on the Net Asset Value Calculation Date will be automatically carried forward to the next Net Asset Value without the possibility of cancellation by the Investor and will not be given priority over new redemption requests received for this Net Asset Value.

**Exemptions from the trigger mechanism:**

The mechanism will not be triggered when the redemption order is immediately followed by a subscription by the same Investor of an equal amount, or an equal number of Units, and carried out on the same Net Asset Value date and the same ISIN code.

**Illustration:**

If the total of redemption requests, net of subscriptions, on a date T represents 10% of the fund's net assets, they may be capped at 5% if the liquidity conditions of the fund's assets are insufficient. Redemptions will therefore be partially executed on date T, by 50% (the ratio between the share of net redemptions of 10% and the 5% threshold) and the balance of 5% will be postponed to the next day. If, on date T+1, the sum of the amount of redemptions net of subscriptions on T+1, and the amount of redemptions carried forward from the previous day, represent less than 5% of the fund's net assets (trigger threshold of the provision), they will no longer be capped. On the other hand, if they are again above 5%, and liquidity conditions remain insufficient to meet them, the mechanism will be extended by one day, and will be renewed until all redemptions can be met.

**Body appointed to receive subscriptions and redemptions**

CACEIS BANK,

registered office: 89-91 Rue Gabriel Péri - 92120 Montrouge, France;

Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.

IZNES, 18 Boulevard Malesherbes, 75008 Paris – France

for eligible investors with access to the shared electronic registration system.

**Determination of the net asset value**

The net asset value is established and published daily, with the exception of public holidays within the meaning of the French Labour Code and the market closure calendar (official Euronext calendar).

The method for calculating the net asset value is specified in the section entitled "Asset valuation and accounting rules".

The net asset value is available upon request from the Management Company on +33 (0)1.47.23.90.90 or on its website ([www.lfde.com](http://www.lfde.com))

## 2.2.12. Fees and commissions

### Subscription and redemption fees

Subscription and redemption fees are added to the subscription price paid by the investor or deducted from the conversion price. The fees paid to the UCITS are used to offset the costs incurred by the UCITS in investing or divesting the assets entrusted to it. Fees not paid to the UCITS revert to the Management Company, the distributor, etc.

Fees borne by the investor, deducted at the time of subscriptions and redemptions	Basis	Rate
Subscription fee not paid to the UCITS	Net asset value x number of units	Unit AD: Maximum of 6.00% <ul style="list-style-type: none"> <li>• None for subscriptions made in the context of life insurance policies offered by La Banque Postale Group entities</li> <li>• None for subscriptions made by a unitholder following a redemption request relating to the same number of securities and the same net asset value</li> <li>• None for reinvestment of dividends within three months of their payment date</li> </ul> Unit I: none Unit I-N: Maximum of 3.00% Unit K: Maximum of 5.00% Units P and S: Maximum of 3.50%
Subscription fee retained by the UCITS	Net asset value x number of units	None
Redemption fee not retained by the UCITS	Net asset value x number of units	Units AD, P and S: Maximum of 1.00% Units I, I-N and K: none
Redemption fee retained by the UCITS	Net asset value x number of units	None

### Operating and management fees

These fees cover all costs invoiced directly to the UCITS, with the exception of transaction fees. Transaction fees include intermediation fees (brokerage fees, stock market taxes, etc.) and transaction fees, where applicable, which may be collected by the Custodian and the Management Company in particular.

The following fees may be charged in addition to operating and management fees:

- turnover commissions invoiced to the UCITS;
- indirect management fees related to subscriptions to UCITS comprising the Fund's assets
- a share of the income from temporary purchases and sales of securities.

**For more details on the fees actually charged to the UCITS, please refer to the Key Investor Information Document.**

	Fees charged to the UCITS	Basis	Interest rate
1-2	Financial management costs and Administrative fees external to the Management Company	Net assets	Units AD and P: Maximum of 2.392% incl. tax Unit I: Maximum of 1.20% incl. tax Unit I-N: Maximum of 0.40% incl. tax <sup>(1)</sup> Unit K: Maximum of 0.80% incl. tax <sup>(2)</sup> Unit S: Maximum of 1.35% incl. tax
3	Maximum indirect fees (management commissions and fees)	Net assets	Non-significant
4	Transaction fees: Management Company (100%) Custodian (none)	Payable on each transaction	French stock exchange: Maximum of 0.36% incl. tax Foreign stock exchange: Maximum of 0.60% incl. tax Options: Maximum of 0.4756% incl. tax; Minimum of €5.00 incl. tax
5	Performance fee	Net assets	None

(1) The 0.40% does not include any distribution fee payable to the distributor.

(2) The 0.80% includes a maximum distribution commission of 0.40%.

Only the fees mentioned below may be outside the scope of the four blocks of fees mentioned above:

- contributions due for management of this Fund pursuant to Article L. 621-5-3 II, 3°, d) of the French Monetary and Financial Code;
- exceptional and non-recurring taxes, duties, fees and government duties (in relation to the Fund);
- exceptional and non-recurring costs for debt recovery (e.g. Lehman) or a procedure to assert a right (e.g. class action procedure).

Information relating to these fees is also described *ex post* in the Fund's annual report.

The Management Company has set up a research account. These research costs invoiced to the Fund will therefore be added to the costs mentioned above and will be a maximum of 0.09% of the net assets.

### 2.2.13. *Securities financing transactions*

Income from temporary purchases and sales of securities, including income generated by the reinvestment of cash collateral linked to transactions, net of direct and indirect operating costs, is returned to the Fund.

Direct and indirect operating costs are borne by the Management Company. The share of these costs may not exceed 50% of the revenue generated.

Please refer to the Fund's annual report for any further information.

### 2.2.14. *Procedure for selecting intermediaries*

Intermediaries must belong to the list drawn up by the Management Company, which is reviewed periodically. Selection is based primarily on the quality of execution.

## 3. Commercial information

Subscription and redemption orders are centralised, on each net asset value publication day, with the Custodian and, for investors with access to the IZNES shared electronic registration system, with IZNES.

The net asset value may be obtained from the Management Company on request. The prospectus, the periodic documents and the annual report are available from the Management Company.

In accordance with the regulatory framework in force concerning inclusion by the Management Company of environmental, social and governance criteria (ESG criteria) in its investment strategy, and resources implemented to contribute to the energy and ecological transition, as well as sustainability risks, and in addition to the information mentioned in the "Investment strategy" section of the prospectus, investors may find said information in the report on the article at the following website: <https://www.lfde.com>, on the Responsible Investor page, as well as in the Fund's annual report and the transparency code.

## 4. Investment rules

The UCITS will comply with the eligibility rules and investment limits provided for by the regulations in force, in particular Articles L 214-20 and R 214-9 et seq. of the French Monetary and Financial Code.

## 5. Method for calculating overall risk

The overall risk on financial contracts is calculated using the commitment method.

## 6. Asset valuation and accounting rules

### 6.1 Revenue recognition

The Fund recognises its income using the coupons received method.

### 6.2 Recognition of portfolio inflows and outflows

Inflows and outflows of securities in the Fund's portfolio are recognised exclusive of trading fees.

### 6.3 Valuation methods

The Fund's designated currency is the Euro.

**• For listed equities, bonds and similar securities (French and foreign securities), the valuation corresponds to the stock market price**

The valuation corresponds to the stock market price.

The stock market price used depends on the market on which the security is listed:

- European stock exchanges: last stock-market price of the day.
- Asian stock exchanges: last stock-market price of the day.
- Australian stock exchanges: last stock-market price of the day.

- North American stock exchanges: last stock-market price of the day.
- South American stock exchanges: last stock-market price of the day.

If a security is not listed at around 2pm, the last stock market price of the previous day is used.

**• Unlisted financial instruments (French and foreign securities) are valued at fair value**

These securities are valued using the fair value method. This corresponds to the amount for which an asset can be exchanged, between knowledgeable, willing parties acting under normal competitive conditions.

During the period beginning on the date on which an investment was made by the Fund and ending no later than 12 months after that date, fair value is estimated in accordance with the price method for a recent investment.

In application of the price method of a recent investment, the Management Company uses the cost of the investment itself or



the price of a significant new investment made with an independent third party under normal market conditions, unless there is a manifest impairment.

- **UCITS and/or AIF securities in the portfolio**

Valuation based on the last known net asset value.

- **Temporary purchases of securities**

- Repurchase agreements: contractual valuation.
- Repurchase options: contractual valuation because the purchase of the securities by the seller is envisaged with sufficient certainty.
- Securities lending: valuation of loaned securities at the market price of the underlying security. The securities are recovered by the UCITS at the end of the loan agreement.

- **Temporary sales of securities**

- Securities sold under repurchase agreements: Securities sold under repurchase agreements are valued at market price; debts representing securities sold under repurchase agreements are maintained at the value set in the contract.

- Unlisted securities: Valuation using methods based on asset value and yield, taking into account the prices used in recent significant transactions.

- **Negotiable debt securities**

With the exception of Notes issued by eurozone governments, whose prices are published on representative databases or contributed by market specialists, negotiable debt securities and equivalent securities are valued on an actuarial basis by applying the swap rate calculated by interpolation for the corresponding maturity, plus or minus a margin estimated according to the intrinsic characteristics of the security issuer.

- **Futures and options**

- Options: The options in the portfolio are valued:
  - at their market value in the event of listing.
  - at their intrinsic value when no listing has been identified.
  - in the event of listing, the market prices used follow the same principle as those governing the underlying contracts or securities.
- Options listed on European markets: last price of the day.
- Options listed on North American markets: last price of the day.

## 7. Remuneration policy

The Management Company has a remuneration policy approved by the Board of Directors.

This policy sets out the principles governing changes in fixed and variable compensation.

The Management Company's Compensation Committee is responsible for applying and monitoring this policy.

Details regarding the remuneration policy are available on the following website: [www.lfde.com](http://www.lfde.com) or free on request from the Management Company.

## 8. Payment

### SECTION I - ASSETS AND UNITS

#### Article 1 - Co-ownership units

Co-ownership rights are expressed in units, with each unit corresponding to the same proportion of the Fund's net assets.

Each unitholder has a co-ownership right to the Fund's assets in proportion to the number of units held.

The term of the Fund is 99 years from its formation, except in the event of early dissolution or an extension, as provided for in these regulations.

The features of the various unit classes and their access conditions are specified in the prospectus.

The various unit classes may:

- have different income allocation rules (distribution or accumulation);
- be denominated in different currencies;
- incur different management fees;
- incur different subscription and redemption fees;
- have a different nominal value;
- be systematically hedged (fully or partially) as specified in the prospectus. This hedging is achieved using financial instruments that minimise the impact of hedging transactions on the UCITS's other unit classes;
- be restricted to one or more marketing networks.

The Management Company may decide to split, consolidate or fraction the units into tenths, hundredths, thousandths or ten-thousandths, which are referred to as "fractional units". The provisions of the rules governing the issue and redemption of units will apply to the fractions of units whose value is always proportional to that of the unit they represent.

All other provisions of the rules relating to the units will automatically apply to the fractions of units, without the need to specify further provisions to that effect.

The Management Company may, at its sole discretion, divide the units through the creation of new units allocated to the unitholders in exchange for the old units.

The units may be accumulation units or accumulation and/or distribution and/or carry-forward units, in accordance with the terms and conditions set out in the prospectus. Distribution units entitle the holder to the payment of dividends in accordance with the procedures provided for in Article 9. Any payment of a dividend will result in an increase in the ratio between the net asset value of the accumulation units and that of the distribution units.

#### Article 2 - Minimum net asset value

Units may not be redeemed if the assets fall below EUR 300,000; if the assets remain below that level for 30 days, the Management Company will take all the necessary steps to liquidate the UCITS in question or carry out one of the transactions mentioned in article 411-16 of the AMF General Regulations (conversion of the UCITS).

#### Article 3 - Issue and redemption of units

Units are issued at any time at the request of unitholders based on the net asset value, plus subscription fees if applicable.

Redemptions and subscriptions are carried out under the terms and conditions set out in the prospectus.

The units in the Fund may be listed on the stock market in accordance with current regulations.

Subscriptions must be paid for in full on the net asset value calculation date. Units may be paid for in cash and/or through a contribution of financial instruments. The Management Company has the right to refuse the securities offered, and in this regard, has seven days starting from the day of the deposit of such securities to communicate its decision. If accepted, the securities contributed will be valued according to the rules stipulated in Article 4, and the subscription will be processed on the basis of the first net asset value calculated following acceptance of the securities.

Redemptions may be carried out in cash and/or in kind. If the redemption in kind corresponds to a representative portion of the portfolio's assets, then only the signed written agreement of the exiting unitholder need be obtained by the UCITS or the Management Company. If the redemption in kind does not correspond to a representative portion of the portfolio's assets, all the shareholders must give their written consent authorising the exiting shareholder to obtain the redemption of their shares against certain particular assets, as defined explicitly in the agreement.

Generally speaking, the assets redeemed will be valued according to the rules stipulated in Article 4 and the redemption in kind will be carried out on the basis of the first net asset value calculated following acceptance of the securities concerned.

Payment must be made by the holder of the issuer account within a maximum period of five days following the deadline for valuation of the units.

However, if in exceptional circumstances the conversion requires the prior sale of assets held in the Fund, this deadline may be extended by a maximum of 30 days.

Except in the case of an inheritance or inter vivos gift, the sale or transfer of units between unitholders, or between a unitholder and a third party, is deemed to constitute a redemption followed

by a subscription. If a third party is involved, the amount of the sale or transfer must, if necessary, be supplemented by the beneficiary to reach the minimum subscription amount required by the prospectus.

Pursuant to Article L. 214-8-7 of the French Monetary and Financial Code, if, under exceptional circumstances it is deemed in the interest of the unitholders, the Fund's redemption of units and its issue of new units may be temporarily suspended by the Management Company.

If the value of the Fund's net assets falls below the amount stipulated in the regulations, no units can be redeemed.

The UCITS may stop issuing units in accordance with paragraph 3 of article L. 214-8-7 of the French Monetary and Financial Code, temporarily or permanently, partially or totally, in certain objectively verifiable situations entailing the closure of subscriptions, for example, the maximum number of units or shares has been issued, the maximum amount of assets has been reached or a specific subscription period has expired. Activation of this tool will be notified to existing holders by any means, along with the threshold and the objective situation that led to the partial or total closure decision. In the case of a partial closure, that notification will specifically state the terms according to which existing holders may continue to subscribe for the duration of the partial closure. Unitholders are also informed by any means of the decision by the Fund or the Management Company to either terminate the total or partial closure of subscriptions (once they have passed below the activation threshold) or not to put end them (in the event of a change of threshold or a change in the objective situation leading to activation of that tool). Any change in the objective situation invoked or the tool's activation threshold must always be made in the interests of unitholders. The notification must specify the exact reasons for such changes.

#### **Case of "US Persons"**

The Fund's Management Company may restrict or prevent the holding of units in the Fund by any person or entity who is prohibited from holding units in the Fund (hereinafter, the "Non-Eligible Person"). A Non-Eligible Person is a "US Person" as defined by SEC *Regulation S* (Part 230 - 17 CFR 230.902) and specified in the Prospectus.

To this end, the Fund's Management Company may:

- (i) refuse to issue any unit if it appears that such issue would or could result in said units being held directly or indirectly for the benefit of a Non-Eligible Person;
- (ii) at any time require a person or entity whose name appears in the register of unitholders to provide it with any information, accompanied by a sworn statement, that it deems necessary for the purpose of determining whether or not the beneficial owner of the units in question is a Non-Eligible Person; and
- (iii) if it appears that a person or entity is (a) a Non-Eligible Person and, (b) alone or jointly, the beneficial owner of the units, proceed with the compulsory redemption of all the units held by such a unitholder after a period of 10 business days following the

date on which the Management Company sends notification of the compulsory redemption to the unitholder. The compulsory redemption will be carried out at the last known net asset value, less any applicable charges, fees and commissions, which will be borne by the Non-Eligible Person after a period of 10 business days following the date on which the Management Company sends notification of compulsory redemption to the unitholder, during which the beneficial owner of the units may present their observations to the competent body.

#### **Article 4 – Calculation of the net asset value**

The net asset value per unit is calculated in accordance with the valuation rules set out in the prospectus.

Contributions in kind may comprise only securities, stocks or contracts admitted for inclusion in the assets of the UCITS; contributions and redemptions in kind are valued in accordance with the valuation rules used for calculating the net asset value.

The Management Company must act in the sole interest of the unitholders at all times, and has the exclusive right to exercise the voting rights attached to the securities held in the Fund. As such, the Management Company has delegated the exercise of voting rights to LBP AM.

## **SECTION II - OPERATION OF THE FUND**

#### **Article 5 - Management Company**

The Fund will be managed by the Management Company in accordance with the Fund's investment objectives. The Management Company must act in the sole interest of the unitholders at all times, and has the exclusive right to exercise the voting rights attached to the securities held in the Fund. As such, the Management Company has delegated the exercise of voting rights to LBP AM.

#### **Article 5 bis - Operational rules**

The instruments and deposits that may be included in the Fund's assets, together with the applicable investment rules, are described in the prospectus.

#### **Article 5 ter - Admission to trading on a regulated market and/or a multilateral trading facility**

The units may be accepted for trading on a regulated market and/or a multilateral trading system according to applicable regulations. If the mutual fund whose units are accepted for trading on a regulated market has a management objective founded on an index, the Fund must have implemented a system ensuring that the price of its units does not significantly vary from its net asset value.

#### **Article 6 - Custodian**

The custodian carries out the tasks that are its responsibility under the laws and regulations in force, as well as those that have been contractually assigned to it by the Management Company. In particular, it must ensure that the portfolio Management Company's decisions comply with the applicable rules and regulations. It must, as needed, take all of the protective measures it deems appropriate. In the event of a dispute with the Management Company, it must inform the AMF.

### Article 7 - Auditor

An auditor is appointed for a term of six years by the executive body of the governance body or the Board of Directors of the portfolio Management Company, subject to approval by the AMF. The auditor certifies that the financial statements reflect a true and fair view of the Company's position.

The auditor's term of office may be renewed.

It is the Statutory Auditor's responsibility to notify the AMF at the earliest opportunity of any fact or decision concerning the UCITS that comes to their attention over the course of the audit which would:

constitute a breach of the laws or regulations applicable to this UCITS and could have a significant impact on its financial position, performance or assets;

affect the conditions or continuation of its operation;

lead to the issuance of reservations or a refusal to certify the financial statements.

The valuations of assets and determination of exchange ratios in any transaction involving a conversion, merger or split must be carried out under the supervision of the auditor.

The auditor is required to evaluate any contribution in kind under its responsibility.

The auditor must verify the composition of the assets and other information prior to publication.

The Statutory Auditor's fees will be set by mutual agreement between the statutory auditor and the portfolio Management Company's board of directors in accordance with a work schedule specifying the measures deemed necessary.

The auditor is required to verify the financial positions serving as a basis for interim payments.

The auditor's fees are included in the management fees.

### Article 8 - Financial statements and management report

At the end of each financial year, the Management Company draws up the summary documents and a management report on the Fund for the previous year. The Management Company will produce a list of the UCI's assets at least twice a year under the supervision of the depositary.

The Management Company will make these documents available to unit holders no later than four months after the financial year-end and will notify them of the amount of income to which they are entitled. These documents will either be sent by post at the shareholders' express request or be made available to them at the offices of the Management Company.

## SECTION III - CONDITIONS FOR ALLOCATING INCOME

### Article 9 – Procedures for the allocation of distributable sums

The Fund's net income is equal to the amount of interest, arrears, dividends, premiums and allotments, as well as all proceeds relating to the securities constituting the Fund's portfolio plus the income of the momentarily available sums and minus the amount of management fees, any allocations to depreciation, and borrowing expenses.

The sums distributed by the Fund are made up of:

1 Net income plus any amounts carried forward and plus/minus the balance of the income equalisation account; and

2 realised capital gains, net of fees, less any realised capital losses, net of fees recorded during the financial year, plus any net capital gains of the same nature recorded during previous financial years that were not distributed or accumulated, plus or minus the balance of capital gains equalisation accounts.

The sums mentioned in 1 and 2 may be distributed, in whole or in part, independently from one another. The Management Company will decide on the allocation of distributable amounts.

For each unit class, where applicable, the prospectus stipulates that the Fund will adopt one of the following formulas for each of the sums mentioned in 1 and 2 above:

- The Fund has opted for pure accumulation. Distributable income is therefore fully capitalised each year, with the exception of mandatory pay-out required by law.
- The Fund has opted for pure distribution. The Fund therefore distributes its net income/net realised capital gains in full each year, rounded to the nearest whole number, within five months following the closing of the annual financial statements. The Management Company may decide, during the financial year, to distribute one or more interim dividends within the limit either of net income or net capital gains realised on the date of the decision. The Fund reserves the right to accumulate and/or distribute all or part of its net income/net realised capital gains and/or carry forward the distributable amounts. Each year, the Management Company decides on the allocation of net income/net realised capital gains.
- In the case of a partial or total distribution, the Management Company may decide to distribute one or more interim dividends within the limit either of the net income recognised or the net capital gains realised on the date of the decision.

## SECTION IV - MERGER - SPLIT - DISSOLUTION - LIQUIDATION

### Article 10 - Merger - Split

The Management Company may either invest all or part of the Fund's assets in another UCITS, or split the Fund into two or more mutual funds.

Any such merger or split operations may only be carried out after only following the unitholder's notification of the proposed operation. Each unitholder will then be sent a new certificate specifying the number of units held.

### Article 11 – Dissolution – Extension

If the Fund's net assets remain below the amount specified in Article 2 above for 30 days, the Management Company must inform the AMF, and unless the Fund is merged with another UCI, it must dissolve the Fund. The Management Company may decide upon the early dissolution of the Fund.

The Management Company may decide upon the early dissolution of the Fund. In this event, it must inform unitholders of its decision and, as from that date, subscription and redemption requests will no longer be accepted.

The Management Company will also dissolve the Fund if it receives a request for the redemption of all the Fund's units, if the custodian is no longer in place and no other custodian has been appointed, or upon expiry of the Fund's term, if no

extension has been agreed.

The Management Company must inform the AMF by post of the date on which the Fund is to be dissolved and of the procedure adopted. It must then submit the Statutory Auditor's report to the AMF.

The Management Company may decide to extend the term of the Fund in agreement with the custodian.

Any decision to extend the term of the Fund must be taken at least three months prior to its expiry date and notified to unitholders and to the AMF.

#### **Article 12 – Liquidation**

In the event of liquidation, the Management Company assumes the role of liquidator or, otherwise, the liquidator is appointed by a legal process on the request of any interested person. To this

end, the custodian or the Management Company will have extensive powers to liquidate the assets, pay any creditors and distribute the available balance among the unitholders in cash or in securities.

The auditor and the custodian will continue to perform their duties until the liquidation process is completed.

## **SECTION V - DISPUTES**

### **Article 13 – Competence – Election of domicile**

Any disputes relating to the Fund that may arise while the Fund is operational or upon its liquidation, either between the unitholders, or between the unitholders and the Management Company or the custodian, will be subject to the jurisdiction of the competent courts.

## 9. List of facilities in Article 92 of Directive 2019/1160

Member States in which the Fund is marketed

- a) process subscription, redemption and repayment orders and make other payments to the unitholders of the UCITS, in accordance with the conditions set out in the documents required under Chapter IX
- b) inform investors of how the orders referred to in point (a) may be placed and the terms of payment of proceeds from redemptions and repayments;
- (c) facilitate the processing of information and access to the procedures and terms referred to in Article 15 relating to investors' exercise of the rights related to their investment in the UCITS in the Member State in which the UCITS is marketed;
- d) make the information and documents required under Chapter IX available to investors, under the conditions set out in Article 94, for reading and for obtaining copies;
- e) provide investors, on a durable medium, with information relating to the tasks that the facilities carry out

France:	CACEIS Bank 89-91 Rue Gabriel Péri - 92120 Montrouge, France; Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.	La Financière de l'Echiquier, Direction Contrôle Interne, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Germany	CACEIS Bank 89-91 Rue Gabriel Péri - 92120 Montrouge, France; Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.	La Financière de l'Echiquier, Direction Contrôle Interne, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Belgium	CACEIS Bank 89-91 Rue Gabriel Péri - 92120 Montrouge, France; Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.	La Financière de l'Echiquier, Direction Contrôle Interne, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Luxembourg	CACEIS Bank 89-91 Rue Gabriel Péri - 92120 Montrouge, France; Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.	La Financière de l'Echiquier, Direction Contrôle Interne, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Italy	Allfunds, Via Bocchetto, 6 – 20123 Milano E-mail: <a href="mailto:simona.ruffini@allfunds.com">simona.ruffini@allfunds.com</a> ; <a href="mailto:veronica.mantovani@allfunds.com">veronica.mantovani@allfunds.com</a>	Allfunds, Via Bocchetto, 6 – 20123 Milano E-mail: <a href="mailto:simona.ruffini@allfunds.com">simona.ruffini@allfunds.com</a> ; <a href="mailto:veronica.mantovani@allfunds.com">veronica.mantovani@allfunds.com</a>
Spain	CACEIS Bank 89-91 Rue Gabriel Péri - 92120 Montrouge, France; Postal address: 12 Place des Etats-Unis - CS 40083 - 92549 Montrouge Cedex, France.	La Financière de l'Echiquier, Direction Contrôle Interne, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Austria	Erste Bank der Österreichischen Sparkassen AG, Am Belvedere 1, A-1100 Vienna - Austria; E-mail: <a href="mailto:foreignfunds0540@erstebank.at">foreignfunds0540@erstebank.at</a>	Erste Bank der Österreichischen Sparkassen AG, Am Belvedere 1, A-1100 Vienna - Austria; E-mail: <a href="mailto:foreignfunds0540@erstebank.at">foreignfunds0540@erstebank.at</a>
Netherlands	BNP Paribas, Grands Moulins de Pantin, 9 rue du Debarcadere 93500 Pantin - France	La Financière de l'Echiquier, Business & Regulatory Solutions, 53 avenue d'Iéna, 75116 Paris, France; E-mail: <a href="mailto:businessregulatory@lfde.com">businessregulatory@lfde.com</a> ; Caroline Farrugia +33 1 47 23 92 14
Portugal	BEST - Banco Electrónico de Serviço Total, S.A., Praça Marquês de Pombal, n°3, 3º, Lisboa Portugal; E-mail: <a href="mailto:di.assetmanagement@bancobest.pt">di.assetmanagement@bancobest.pt</a>	BEST - Banco Electrónico de Serviço Total, S.A., Praça Marquês de Pombal, n°3, 3º, Lisboa Portugal; E-mail: <a href="mailto:di.assetmanagement@bancobest.pt">di.assetmanagement@bancobest.pt</a>

Par **investissement durable**, on entend un investissement dans une activité économique qui contribue à un objectif environnemental ou social, pour autant qu'il ne cause de préjudice important à aucun de ces objectifs et que les sociétés bénéficiaires des investissements appliquent des pratiques de bonne gouvernance.

La **taxonomie de l'UE** est un système de classification institué par le règlement (UE) 2020/852, qui dresse une liste d'**activités économiques durables sur le plan environnemental**. Ce règlement ne comprend pas de liste des activités économiques durables sur le plan social. Les investissements durables ayant un objectif environnemental ne sont pas nécessairement alignés sur la taxonomie.

Les **indicateurs de durabilité** servent à vérifier si le produit financier est conforme aux caractéristiques environnementales ou sociales promues par le produit financier.

Les **indicateurs de durabilité** évaluent la mesure dans laquelle les caractéristiques environnementales ou sociales promues par le produit financier sont atteintes.

**Dénomination du produit:**  
TOCQUEVILLE VALUE EUROPE ISR

**Identifiant d'entité juridique:**  
9695000XVWUFVDES5704

### Caractéristiques environnementales et/ou sociales

#### Ce produit financier a-t-il un objectif d'investissement durable?

Oui

Non

Il réalisera un minimum **d'investissements durables ayant un objectif environnemental** : %

dans des activités économiques qui sont considérées comme durables sur le plan environnemental au titre de la taxonomie de l'UE

dans des activités économiques qui ne sont pas considérées comme durables sur le plan environnemental au titre de la taxonomie de l'UE

Il réalisera un minimum **d'investissements durables ayant un objectif social** : %

Il **promeut des caractéristiques environnementales et sociales (E/S)** et, bien qu'il n'ait pas pour objectif l'investissement durable, il contiendra une proportion minimale de 35% d'investissements durables

ayant un objectif environnemental et réalisés dans des activités économiques qui sont considérées comme durables sur le plan environnemental au titre de la taxonomie de l'UE

ayant un objectif environnemental et réalisés dans des activités économiques qui ne sont pas considérées comme durables sur le plan environnemental au titre de la taxonomie de l'UE

ayant un objectif social

Il promeut des caractéristiques E/S, mais **ne réalisera pas d'investissements durables**



#### Quelles caractéristiques environnementales et/ou sociales sont promues par ce produit financier ?

La démarche ISR de la gestion du Produit Financier vise à identifier et sélectionner les émetteurs qui :

- Proposent des innovations, des solutions aux principaux enjeux : démographie, urbanisation, environnement, climat, agriculture, alimentation, santé publique...
- Anticipent l'importance de ces enjeux par une conduite, une responsabilité sur les quatre axes de la philosophie ISR de la Société de Gestion.

Cette analyse repose sur la philosophie GREaT, propre à la Société de Gestion, et articulée autour des 4 piliers suivants :

- Gouvernance responsable
- Gestion durable des Ressources
- Transition Énergétique
- Développement des Territoires

Le poids associé à chaque pilier pour le calcul de la note GREaT d'un émetteur est ajusté en fonction de son secteur d'activité afin de tenir compte de ses spécificités. Par exemple, l'enjeu autour de la réduction des émissions de gaz à effets de serre n'est pas équivalent pour une entreprise du secteur des services et pour une entreprise industrielle, le premier secteur étant structurellement moins émissif que le second. En tout état de cause, le poids associé à chacun des trois piliers « Environnement », « Social » et « Gouvernance », calculés en réaffectant les critères des piliers GREaT, est compris entre 20% et 60%.

#### ○ Quels sont les indicateurs de durabilité utilisés pour mesurer la réalisation de chacune des caractéristiques environnementales ou sociales promues par le produit financier ?

La contribution à un des objectifs environnementaux et sociaux précités est évaluée à partir de différentes sources, dont notamment :

Pour l'ensemble des objectifs environnementaux et sociaux :

- Le score « GREaT », méthodologie d'analyse quantitative propriétaire du Groupe LBP AM, qui permet de couvrir l'ensemble des objectifs environnementaux et sociaux,
- Le score « ODD », analyse qualitative propriétaire de LFDE qui évalue les produits, services et pratiques des entreprises en vue de mesurer leur contribution à l'atteinte des Objectifs de Développement Durable des Nations Unies (ODD).

Sur les objectifs spécifiques au climat et à la biodiversité :

- L'engagement de l'émetteur sur une trajectoire de décarbonation de ses activités compatible avec les objectifs des accords de Paris, selon des critères définis par la Société de Gestion,
- Le score « Greenfin », indicateur quantitatif mesurant l'exposition du modèle d'affaire de l'émetteur à des éco-activités telles que définies par le label d'Etat français Greenfin, dédié au financement de la transition énergétique et écologique,

- Le score « Bird », indicateur quantitatif propriétaire du Groupe LBP AM visant à évaluer les entreprises principalement sur leurs politiques ainsi que sur leurs pratiques et impacts en lien avec la biodiversité,
- Le score « Maturité Climat & Biodiversité », analyse qualitative propriétaire de LFDE visant à évaluer la maturité des entreprises dans la prise en compte des enjeux climatiques et de biodiversité auxquels elles sont et seront confrontées

Sur la thématique spécifique de l'accès à la santé :

- Le score « AAAA » (Acceptability, Accessibility, Affordability, Availability), analyse qualitative propriétaire de LFDE visant à évaluer la contribution des entreprises au travers de leurs produits et services aux 4 dimensions de l'accès à la santé (Disponibilité, Accessibilité Géographique, Accessibilité Financière, Acceptabilité) inspirées des travaux de l'Organisation Mondiale de la Santé (OMS) sur le sujet

Des informations complémentaires sur les différents scores sont disponibles dans le document « SFDR – Méthodologie Investissement Durable » accessible sur le site internet de la Société de Gestion (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE – Règlement SFDR ».

○ **Quels sont les objectifs des investissements durables que le produit financier entend notamment poursuivre et comment les investissements effectués contribuent-ils à ces objectifs ?**

Le Produit Financier vise la réalisation d'Investissements Durables environnementaux et sociaux au sens du Règlement SFDR. Le seuil minimal d'Investissements Durables du Produit Financier est précisé dans l'encart en tête de la présente annexe. Les investissements durables ainsi réalisés par le Produit Financier peuvent répondre à des objectifs environnementaux et/ou sociaux.

Sur la thématique environnementale, les 6 objectifs de la Taxonomie européenne sont considérés, à savoir :

- L'atténuation du changement climatique,
- L'adaptation au changement climatique,
- L'utilisation durable et la protection des ressources marines,
- La transition vers une économie circulaire,
- La prévention et la réduction de la pollution,
- La protection et la restauration de la biodiversité et des écosystèmes.

A noter que la méthodologie appliquée ne permet pas de mesurer la contribution des investissements selon la définition de la Taxonomie européenne (i.e. l'alignement taxonomique des investissements).

En revanche, la contribution des investissements aux objectifs environnementaux au sens de l'article 2(17) du Règlement (EU) 2019/2088 (« Règlement SFDR ») est mesurée au moyen d'indicateurs propres au Groupe LBP AM et précisés ci-après.

Sur la thématique sociale, les objectifs considérés sont :

- Le respect et la promotion des Droits humains, notamment la promotion de conditions de travail justes et favorables, l'intégration sociale par le travail, la protection et la promotion des Droits des communautés locales,
- Le développement des territoires et des communautés, à travers les relations avec les parties prenantes extérieures à l'entreprise et la gestion responsable des chaînes de valeur, et afin d'adresser les enjeux de développement socio-économique, de lutte contre les fractures sociales et territoriales, de soutien aux acteurs locaux et d'accès à l'éducation,
- Améliorer l'accès à la santé et aux soins essentiels dans le monde en adressant les enjeux de disponibilité, d'accessibilité géographique, d'accessibilité financière et d'acceptabilité des traitements.

Cette stratégie généraliste n'implique pas que tout investissement durable réponde à l'ensemble des objectifs environnementaux et sociaux précités, mais que les investissements durables doivent répondre à au moins un de ces enjeux, tout en ne nuisant pas de manière significative aux autres.

Une description plus complète des seuils appliqués pour chaque critère est disponible dans le document « SFDR – Méthodologie Investissement Durable » accessible sur le site internet de la Société de Gestion (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE – Règlement SFDR ».

○ **Dans quelle mesure les investissements durables que le produit financier entend notamment poursuivre ne causent-ils pas de préjudice important à un objectif d'investissement durable sur le plan environnemental ou social ?**

Afin de s'assurer qu'un investissement contribuant à un objectif de durabilité, selon la méthode d'analyse présentée ci-dessus, ne cause pas de préjudice important à tout objectif d'investissement durable sur le plan environnemental ou social, la méthodologie appliquée considère systématiquement et de manière cumulative :

- Les pratiques de l'émetteur relatives à sa gestion des ressources environnementales et de respect des Droits humains. Ce point est contrôlé grâce à la méthodologie d'analyse extra-financière propriétaire « GREaT »
- L'exposition de l'émetteur à des secteurs sensibles sur les aspects environnementaux et sociaux (comme par exemple au charbon thermique, aux armes controversées, au tabac, aux jeux d'argent...) en lien avec les politiques d'exclusions applicables dans les Sociétés de Gestion du Groupe LBP AM. Une description plus complète des exclusions est disponible dans le document « Politique d'exclusion » accessible sur le site internet de la Société de Gestion (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE - Approche et Méthodologies ».
- L'exposition de l'émetteur à une controverse sévère sur les enjeux environnementaux, sociaux et de gouvernance, ou bien à un risque critique de violation grave des Principes directeurs de l'OCDE à l'intention des entreprises multinationales et des Principes directeurs des Nations Unies sur les entreprises et les droits de l'Homme.



Les principales incidences négatives correspondent aux incidences négatives les plus significatives des décisions d'investissement sur les facteurs de durabilité liés aux questions environnementales, sociales et de personnel, au respect des droits de l'homme et à la lutte contre la corruption et les actes de corruption.

**- Comment les indicateurs concernant les incidences négatives ont-ils été pris en considération ?**

Le Règlement Délégué (UE) 2022/1288 de la Commission (ci-après le "Règlement délégué SFDR") définit une liste d'indicateurs permettant de mesurer les incidences négatives d'un émetteur sur les facteurs de durabilité environnementaux et sociaux (ci-après les "indicateurs concernant les incidences négatives"). Les indicateurs concernant les incidences négatives sont calculés pour chaque émetteur, lorsque la donnée est disponible et intégrés dans l'outil d'analyse extra-financière.

Certains indicateurs ont par ailleurs été directement intégrés, soit à la méthodologie de notation propriétaire GREaT utilisée à la fois pour identifier une contribution positive ou un impact négatif significatif, soit à l'indicateur de controverse mentionné ci-dessus, soit dans les politiques d'exclusions. La prise en considération des principales incidences négatives a également lieu au travers de la démarche d'engagement actionnarial avec les entreprises afin d'améliorer leur transparence sur ces indicateurs et de réduire leurs externalités négatives.

**- Dans quelle mesure les investissements durables sont-ils conformes aux principes directeurs de l'OCDE à l'intention des entreprises multinationales et aux principes directeurs des Nations unies relatifs aux entreprises et aux droits de l'homme ?**

Afin de s'assurer que les investissements durables respectent les Principes directeurs de l'OCDE à l'intention des entreprises multinationales et les principes directeurs des Nations Unies relatifs aux entreprises et aux Droits de l'Homme, la Société de Gestion contrôle systématiquement :

- La correcte application de la politique d'exclusion de la Société de Gestion relative à ces traités internationaux et le processus de contrôle des controverses ad hoc.
- La disqualification des émetteurs identifiés comme ayant des mauvaises pratiques sur le pilier "Gestion durable des ressources" de la méthodologie d'analyse GREaT, qui intégrait des critères relatifs au respect des droits humains et du droit du travail.

Une description détaillée des seuils appliqués pour chaque critère est disponible dans le document « SFDR – Méthodologie Investissement Durable » accessible sur le site internet de la Société de Gestion (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE – Règlement SFDR ».

La taxonomie de l'UE établit un principe consistant à « ne pas causer de préjudice important » en vertu duquel les investissements alignés sur la taxonomie ne devraient pas causer de préjudice important aux objectifs de la taxonomie de l'UE et qui s'accompagne de critères spécifiques de l'UE. Le principe consistant à « ne pas causer de préjudice important » s'applique uniquement aux investissements sous-jacents au produit financier qui prennent en compte les critères de l'Union Européenne en matière d'activités économiques durables sur le plan environnemental. Les investissements sous-jacents à la portion restante de ce produit financier ne prennent pas en compte les critères de l'Union Européenne en matière d'activités économiques durables sur le plan environnemental. Tout autre investissement durable ne doit pas non plus causer de préjudice important aux objectifs environnementaux ou sociaux.



**Ce produit financier prend-il en considération les principales incidences négatives sur les facteurs de durabilité ?**

Oui

Non

Concernant les incidences négatives, ce produit financier prend en compte 14 indicateurs obligatoires du Tableau 1 de l'Annexe I du Règlement Délégué (UE) 2022/1288 de la Commission européenne, et inclut également les 2 indicateurs additionnels suivants :

- investissements dans des entreprises sans initiative de réduction carbone
- investissements dans des entreprises sans politique de prévention des accidents du travail

Leur prise en compte est réalisée au sein des différents pans de la démarche d'investissement responsable de la société de gestion : à travers la politique d'exclusion (sectorielle et normative), la méthodologie d'analyse ESG, les différents scores d'impact, la mesure et le pilotage d'indicateurs de performance ESG et l'engagement avec les entreprises.

Des informations complémentaires sur la prise en compte des principales incidences négatives sont disponibles dans le document « Article 4 SFDR – Principales incidences négatives » accessible sur le site internet de la Société de Gestion (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE – Règlement SFDR »



## Quelle est la stratégie d'investissement suivie par ce produit financier ?

La stratégie d'investissement guide les décisions d'investissement selon des facteurs telles que les objectifs d'investissement et la tolérance au risque.

L'objectif du fonds est d'investir sur les marchés d'actions européens, en sélectionnant des valeurs répondant à des critères d'investissement socialement responsable (selon l'analyse de la société de gestion) et dont la valorisation est jugée décotée par la société de gestion (« Value »), tout en recherchant à limiter les risques de forte variation du portefeuille.

- **Quelles sont les contraintes définies dans la stratégie d'investissement utilisée pour sélectionner les investissements afin d'atteindre chacune des caractéristiques environnementales ou sociales promues par ce produit financier ?**

Les éléments contraignants utilisés pour sélectionner les investissements et atteindre les caractéristiques environnementales et sociales promues par l'OPC sont les suivants :

- la politique d'exclusion de la Société de Gestion et les contraintes d'exclusions sectorielles ou normatives qui en découlent,
- l'évaluation ESG contraignante de chacun des émetteurs présents en portefeuille au travers une analyse quantitative grâce à l'outil de scoring GREaT (méthodologie propriétaire du groupe LBP AM)
- les contraintes associées aux indicateurs de durabilité présentés dans la rubrique « Quels sont les indicateurs de durabilité utilisés pour mesurer la réalisation de chacune des caractéristiques environnementales ou sociales promues par le Produit Financier » ci-dessus.

- **Dans quelle proportion minimale le produit financier s'engage-t-il à réduire son périmètre d'investissement avant l'application de cette stratégie d'investissement ?**

Le fonds suit une approche en sélectivité qui consiste à réduire l'univers d'investissement de 20% des plus mauvaises valeurs (sur la base des notes ESG et de l'ensemble des exclusions appliquées par le fonds)

- **Quelle est la politique mise en oeuvre pour évaluer les pratiques de bonne gouvernance des sociétés dans lesquelles le produit financier investit ?**

Le contrôle de l'application des principes de bonne gouvernance par les émetteurs est contrôlé par le biais :

- d'un indicateur quantitatif provenant de la méthodologie d'analyse propriétaire « GREaT », le pilier « Gouvernance » couvre notamment les sujets d'équilibre des pouvoirs, de rémunération équitable et d'éthique des affaires.

Un émetteur est jugé appliquer des principes de bonne gouvernance dès lors que cet indicateur susmentionné permet de conclure en ce sens.

Les pratiques de **bonne gouvernance** concernent des structures de gestion saines, les relations avec le personnel, la rémunération du personnel et le respect des obligations fiscales



## Quelle est l'allocation des actifs prévue pour ce produit financier ?

**L'allocation des actifs** décrit la part des investissements dans des actifs spécifiques.

Les activités alignées sur la taxinomie sont exprimées en pourcentage:

- du **chiffre d'affaires** pour refléter la part des revenus provenant des activités vertes des sociétés dans lesquelles le produit financier investit ;

- des **dépenses d'investissement** (CapEx) pour montrer les investissements verts réalisés par des sociétés dans lesquelles le produit financier investit, pour une transition vers une économie verte par exemple;

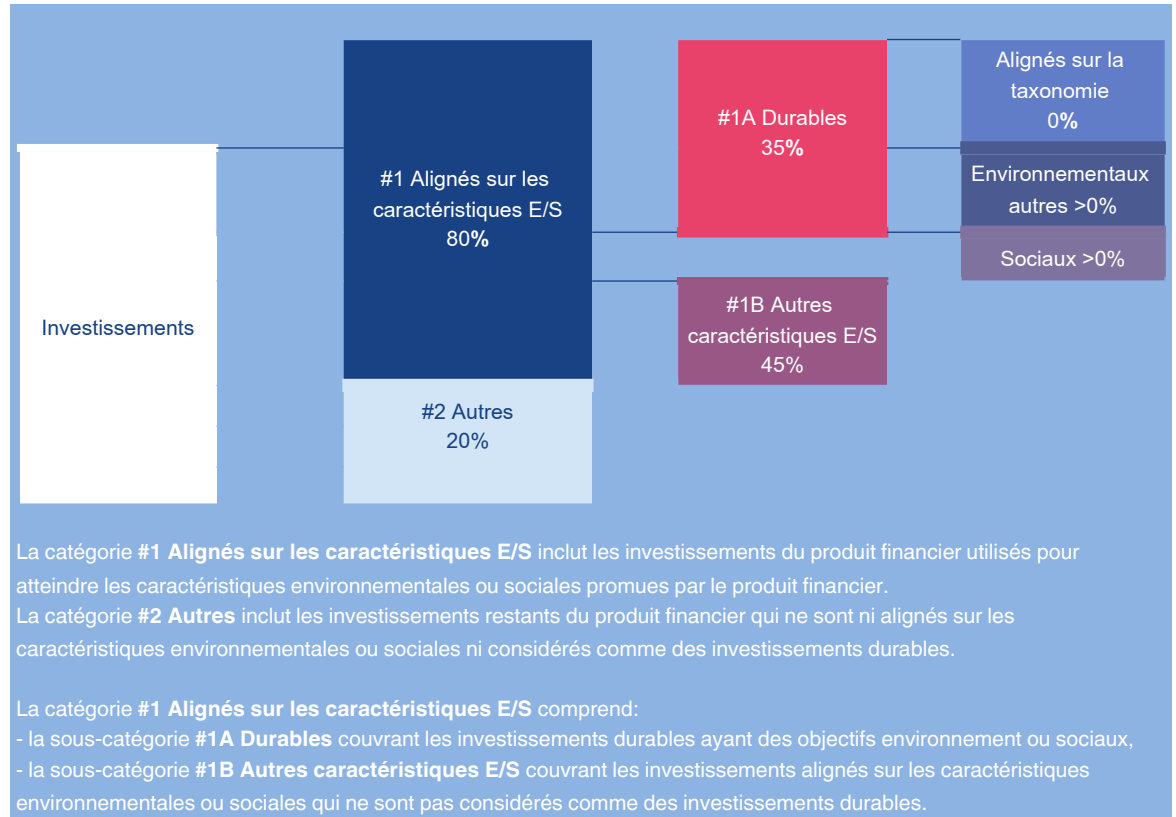
- des **dépenses d'exploitation** (OpEx) pour refléter les activités opérationnelles vertes des sociétés dans lesquelles le produit financier investit.

Le produit financier investit au moins 80% de ses actifs dans des actifs qui ont été considérés comme "éligibles" selon le processus ESG en place - donc dans des investissements qui sont alignés avec les caractéristiques environnementales et sociales promues (#1 Alignés avec les caractéristiques E/S).

Jusqu'à 20% des investissements ne sont pas alignés avec ces caractéristiques (#2 Autres).

Le produit financier investit au moins 35% de ses actifs dans des actifs qui ont été considérés comme étant des investissements durables (#1A Durables).

Une description plus détaillée de l'allocation d'actifs spécifique de ce produit financier peut être trouvée dans le prospectus de celui-ci.



### ○ Comment l'utilisation de produits dérivés atteint-elle les caractéristiques environnementales ou sociales promues par le produit financier ?

Les produits dérivés utilisés par le Produit Financier ne visent pas à contribuer à l'atteinte des caractéristiques environnementales ou sociales promues. Leur utilisation est limitée à des opérations de couverture ou d'exposition temporaire afin de répondre à un fort mouvement de passif, de gagner une exposition temporaire au bêta de marché ou d'accompagner un changement de stratégie. Par ailleurs, la Société de Gestion s'assure que l'utilisation des produits dérivés ne va pas à l'encontre des caractéristiques environnementales ou sociales promues par le Produit Financier. Notamment, la Société de Gestion n'utilise pas de dérivés dans le but d'améliorer artificiellement la performance extra-financière du produit. Les contraintes relatives à l'emploi de produits dérivés sont précisées dans la documentation précontractuelle du Produit Financier.

Pour être conforme à la Taxonomie de l'UE, les critères applicables au **gaz fossile** comprennent des limitations des émissions et le passage à l'électricité d'origine renouvelable ou à des carburants à faible teneur en carbone d'ici à la fin de 2035. En ce qui concerne l'**énergie nucléaire**, les critères comprennent des règles complètes en matière de sûreté nucléaire et de gestion des déchets.

Les **activités habilitantes** permettent directement à d'autres activités de contribuer de manière substantielle à la réalisation d'un objectif environnemental.

Les **activités transitoires** sont des activités pour lesquelles il n'existe pas encore de solutions de remplacement sobres en carbone et, entre autres, dont les niveaux d'émission de gaz à effet de serre correspondent aux meilleures performances réalisables.



## Dans quelle proportion minimale les investissements durables ayant un objectif environnemental sont-ils alignés sur la taxonomie de l'UE ?

Le produit financier peut investir dans des activités économiques durables sur le plan environnemental, néanmoins les investissements de ce produit financier ne prennent pas en compte les critères de l'Union européenne en matière d'activités économiques durables sur le plan environnemental. Le produit financier s'engage à un alignement de 0% avec la Taxonomie européenne.

**Le produit financier investit-il dans des activités liées au gaz fossile et/ou à l'énergie nucléaire qui sont conformes à la taxonomie de l'UE ?<sup>(1)</sup>**

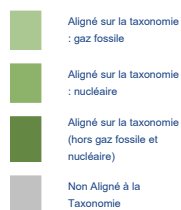
Oui

Dans le gaz fossile

Dans l'énergie nucléaire

Non

Les deux graphiques ci-dessous font apparaître en vert le pourcentage minimal d'investissements alignés sur la taxonomie de l'UE. Étant donné qu'il n'existe pas de méthodologie appropriée pour déterminer l'alignement des obligations souveraines\* sur la taxonomie, le premier graphique montre l'alignement sur la taxonomie par rapport à tous les investissements du produit financier, y compris les obligations souveraines, tandis que le deuxième graphique représente l'alignement sur la taxonomie uniquement par rapport aux investissements du produit financier autres que les obligations souveraines.



100.0%



100.0%

Ce graphique représente 100% du total des investissements.

\* Aux fins de ces graphiques, les «obligations souveraines» comprennent toutes les expositions souveraines.

**Quelle est la proportion minimale d'investissements dans des activités transitoires et habilitantes ?**

Le Produit Financier ne s'engage pas sur une proportion minimale d'investissements dans des activités transitoires et habilitantes.



## Quelle est la proportion minimale d'investissements durables ayant un objectif environnemental qui ne sont pas alignés sur la taxonomie de l'UE ?

Ce produit entend investir une part de son actif dans des investissements durables. Ces investissements pourront contribuer à des objectifs environnementaux ou sociaux, sans qu'il ne soit pris d'engagement quant à la part minimale de chacun. Ainsi, la part minimale d'investissements durables ayant un objectif environnemental qui ne sont pas alignés avec la taxonomie de l'UE est >0%.



## Quelle est la proportion minimale d'investissements durables sur le plan social ?

Ce produit entend investir une part de son actif dans des investissements durables. Ces investissements pourront contribuer à des objectifs environnementaux ou sociaux, sans qu'il ne soit pris d'engagement quant à la part minimale de chacun. Ainsi, la part minimale d'investissements durables ayant un objectif social est >0%.



## Quels sont les investissements inclus dans la catégorie "#2 Autres", quelle est leur finalité et des garanties environnementales ou sociales minimales s'appliquent-elles à eux ?

Les investissements inclus dans la catégorie "#2 Autres" du produit financier représentent jusqu'à 20% des investissements. Il peut s'agir, en fonction des instruments éligibles tels que définis dans le prospectus du produit, d'instruments financiers à terme (dérivés) négociés sur des marchés réglementés ou organisés, pour exposer et couvrir le portefeuille, des liquidités, des émetteurs non notés.

Les produits dérivés et les liquidités ne présentent pas de garanties environnementales ou sociales.

Le symbole représente des investissements durables ayant un objectif environnemental qui ne tiennent pas compte des critères applicables aux activités économiques durables sur le plan environnemental au titre de la taxonomie de l'UE.

(1) Les activités liées au gaz fossile et/ou au nucléaire ne seront conformes à la taxonomie de l'UE que si elles contribuent à limiter le changement climatique ("atténuation du changement climatique") et ne causent de préjudice important à aucun objectif de la taxonomie de l'UE - voir la note explicative dans la marge de gauche. L'ensemble des critères applicables aux activités économiques dans les secteurs du gaz fossile et de l'énergie nucléaire qui sont conformes à la taxonomie de l'UE sont définis dans le règlement délégué (EU) 2022/1214 de la Commission.



Un indice spécifique a-t-il été désigné comme indice de référence pour déterminer si ce produit financier est aligné sur les caractéristiques environnementales et/ou sociales qu'il promeut ?

Les indices de référence sont des indices permettant de mesurer si le produit financier atteint les caractéristiques environnementales ou sociales qu'il promeut.

Non applicable

**Comment l'indice de référence est-il en permanence aligné sur chacune des caractéristiques environnementales ou sociales promues par le produit financier ?**

Non applicable

**Comment l'alignement de la stratégie d'investissement sur la méthodologie de l'indice est-il à tout moment garanti ?**

Non applicable

**En quoi l'indice désigné diffère-t-il d'un indice de marché large pertinent ?**

Non applicable

**Où trouver la méthode utilisée pour le calcul de l'indice désigné ?**

Non applicable



Où puis-je trouver en ligne davantage d'informations spécifiques au produit ?

**De plus amples informations sur le produit sont accessibles sur le site internet:**

Il est possible de disposer de plus d'informations concernant l'approche extra-financière de la Société de Gestion au travers des documents disponibles sur son site internet (<https://www.lfde.com>), dans la section « Investissement Responsable », sur la page « Pour aller plus loin », au sein de la rubrique « Documents LFDE – Règlement SFDR ».

Par ailleurs, des informations complémentaires sur le fonds et notamment sa documentation réglementaire sont disponibles sur le site internet de la Société de Gestion ([www.lfde.com](http://www.lfde.com)), dans la section « Fonds ».